EXHIBIT O

EXHIBIT 7

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NERA
ECONOMIC CONSULTING

Expert Report of Lauren J. Stiroh, Ph.D.

In re: High-Tech Employee Antitrust Litigation

November 25, 2013

Table of Contents

I.   Introduction

A.   Qualifications

1.   My name is Lauren J. Stiroh. I am an economist and Senior Vice President of NERA Economic Consulting. NERA was founded in 1961 and provides research and analysis in the field of applied microeconomics, including the economics of competition, regulation, and finance. A substantial portion of NERA's consulting work, as well as my own work, is in the determination of economic damages.

2.   I have provided economic consulting services and testimony in a number of antitrust liability and damages cases and have testified at trial and in deposition regarding a variety of business practices. These include, for example, commercial disputes, business interference, breach of contract, allegations of monopolization, price predation, unlawful tie-ins, price discrimination, abuse of market power, and patent infringement. I have experience with damages issues in a range of industries including industrial chemicals, automotive services, consumer products, pharmaceuticals, biotechnology, medical devices, agricultural products, advertising and promotion, and semiconductors.

3.   I received my Ph.D. in economics from Harvard University in 1996. Prior to that, I received my B.A. in economics from the University of Western Ontario in 1990, and my M.A. from the University of British Columbia in 1991. My curriculum vitae, which includes a list of my prior expert testimony, is appended to this report as **Exhibit 1**. NERA is being compensated at my usual rate of $700 per hour. NERA's compensation does not depend on the outcome of this litigation.

B.   Assignment

4.   I have been asked by counsel for Adobe Systems Inc. ("Adobe"), Apple Inc. ("Apple"), Google Inc. ("Google"), and Intel Corp. ("Intel") to review and comment on the theories and calculations in the merits report of Dr. Edward E. Leamer, expert for Plaintiffs in connection with *In re: High-Tech Employees Antitrust Litigation*.[1] In particular, I have been asked to opine on the conclusions reached by Dr. Leamer that the alleged actions of Adobe, Apple, Google, Intel, Intuit Inc. ("Intuit"), Lucasfilm Ltd. ("Lucasfilm"), and Pixar (collectively "Defendants"[2]) suppressed compensation to the Class from March 2005 to March

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[1] Expert Report of Edward E. Leamer, Ph.D., October 28, 2013 ("Leamer October 2013 Merits Report").

[2] It is my understanding that Intuit, Lucasfilm, and Pixar have reached settlements in this matter.

2009 (the "Class period") through the use of "Do Not Cold Call" or "DNCC" agreements, and to examine the model he uses to calculate damages.[3]

C. Materials Relied Upon

5. In preparing this report, I, and economists working under my direction, have reviewed the Expert Report of Edward E. Leamer, Ph.D. submitted October 28, 2013 and documents and data referenced therein, in addition to Dr. Leamer's reports in this matter submitted October 1, 2012, December 10, 2012, May 10, 2013 and July 12, 2013 and documents and data referenced therein.[4] I have also reviewed the Expert Report of Professor Kevin M. Murphy submitted January 17, 2013, the Supplemental Expert Report of Professor Kevin M. Murphy submitted June 21, 2013, the Expert Witness Report of Kevin F. Hallock submitted May 10, 2013, the Expert Witness Report of Kevin F. Hallock submitted October 27, 2013, the Expert Report of Kathryn Shaw, Ph.D. submitted June 21, 2013, the Expert Report of Alan Manning, Ph.D. submitted October 28, 2013 and the Expert Report of Matthew Marx submitted October 28, 2013, and documents and data referenced therein. I, or members of my team, have also reviewed additional documents, declarations and deposition testimony produced in connection with this case, as well as other publicly available information.

6. The opinions expressed in this report are based on my analysis and research conducted for this report, and my training and experience as an economist. A complete list of the sources of information and materials I relied upon in forming my opinion is presented in **Exhibit 2**. In addition to the materials listed in **Exhibit 2**, I, and members of my team, have had conversations with Frank Wagner, Director of Compensation at Google, and Danny McKell, Compensation and Benefits Specialist at Intel.

D. Summary of Opinions

7. Based on my analysis to date, I have reached the following opinions:

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[3] Plaintiffs seek to represent a nationwide Class of "salaried technical, creative, and research and development employees who worked for any Defendant while that Defendant participated in at least one anti-solicitation agreement with another Defendant." (Order Granting Plaintiffs' Supplemental Motion for Class Certification, *In re: High-Tech Employee Antitrust Litigation*, Case No. 5:11-CV-02509-LHK, October 24, 2013 ("Order Granting Plaintiffs' Supplemental Motion for Class Certification"), p. 10.)

[4] These reports are titled the Expert Report of Edward E. Leamer, Ph.D., October 1, 2012 ("Leamer October 2012 Report"), the Reply Expert Report of Edward E. Leamer, Ph.D., December 10, 2012 ("Leamer December 2012 Reply Report"), the Supplemental Expert Report of Edward E. Leamer, Ph.D., May 10, 2013 ("Leamer May 2013 Supplemental Report") and the Rebuttal Supplemental Expert Report of Edward E. Leamer, Ph.D., July 12, 2013 ("Leamer July 2013 Rebuttal Supplemental Report").

Introduction

a. The theories that Dr. Leamer relies upon to establish impact and damages are flawed and unsupported by his data or analyses. There is no evidence to support Dr. Leamer's assertion that impact was widespread or can be properly measured by the methods and models he employs. To the contrary, data and information produced in this case suggest that the information flow during the Class period was not impeded in any meaningful fashion. Dr. Leamer's impact and damages estimates are the result of flaws in his model and the failure of his model to account for the overall economic climate, firm specific actions, or outside events.

b. Despite occasional decreases in average total compensation, the overall trend from 2001 through 2011 has been for the average Class member's compensation to increase over time. There is substantial volatility in average total compensation, average base salary, average bonus and average equity, and there does not appear to be any consistent pattern of changes to compensation practices at these firms concurrent with the timing of the DNCC agreements.

c. Plaintiffs' theory of harm does not support damages to the entire Class. The amount of information allegedly restricted through DNCC agreements was only one of many potential sources of "price discovery" information available to employees. The impact of the restrictions on cold-calling would have, at most, reduced information to specific employees about specific opportunities.

d. The amount of information that might reasonably have been restricted by DNCC agreements is small. Transfers between firms with DNCC agreements represented only a very small fraction (0.2 percent) of the new hires at Defendant firms even before the Class period. In addition, the percentage of a Defendant's new hires coming from a firm with which it had a DNCC agreement did not substantially decrease during the Class period. As overall hiring did not decrease during the Class period, and the percent of new hires between companies with a DNCC agreement was small before, during and after the Class period, there is no basis to assume that the amount of "price discovery" information was lessened during the Class period.

e. Dr. Leamer's analyses attempting to show the so-called "ripple effect" do not provide evidence of a "somewhat rigid" pay structure that would cause the impact of fewer cold calls from companies in a DNCC agreement to be broadly felt.[5]

f. Dr. Leamer's model for estimating alleged Class-wide impact and damages suffers from numerous flaws that make it unreliable. The model suffers from specification errors and is improperly specified to test the theory of harm alleged. The model

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[5] I will use the term "ripple effect" to refer to what Dr. Leamer has referred to in various ways to describe his theory that the impact of a cold call is allegedly spread beyond the recipient of the call. (Leamer October 2013 Merits Report, ¶ 14 and Leamer October 2012 Report, ¶ 104.)

Introduction

yields counter-intuitive and implausible results that are inconsistent with Plaintiffs' theory of harm or well-established relationships in labor economics. The model is not robust to changes in specification and as a result "damages" are greatly diminished or eliminated entirely when minor changes are made to the specification. Adjusting the model to correct certain flaws in the model result in no Class-wide impact from these agreements.

g. Reasonable alterations to Dr. Leamer's model substantially change the estimated damages figure and cast serious doubt on the model's ability to properly assign damages. Adjusting Dr. Leamer's model to use nominal figures, as employers did not have perfect information about the future inflation prior to setting compensation, substantially reduces what he believes to be damages caused by the alleged conduct. Similarly, adjusting to allow for varying impact of conduct by firm, as compensation practices differ at each firm, substantially reduces or eliminates the alleged damages. And, adjusting Dr. Leamer's model to isolate the impact of hiring at firms with a DNCC agreement from the impact of hiring at firms without a DNCC agreement, substantially reduces or eliminates the purported damages.

h. The "conduct" variable Dr. Leamer uses does not support his theory of harm, nor does it accurately measure the alleged information loss as a result of the agreements at issue. In fact, it is inaccurate for Dr. Leamer to call it a "conduct" variable. It is simply a time indicator that captures all changes in compensation that have not otherwise been accounted for during the alleged Class period. As a result, there is no basis to assume that the effect that Dr. Leamer appears to be measuring arises from a reduction in information flow as opposed to other microeconomic and macroeconomic factors that occurred concurrent with the Class period but are omitted from his damage analysis.

i. Numerous events occurred in the Class period that affected compensation at the Defendants' firms, independent of any alleged "conduct" but are unaccounted for in Dr. Leamer's model. For example, the model does not account for the impact of the 2008-2009 recession during the alleged Class period. It does not allow for variation in how each of the Defendants responded to the recession when setting compensation. It cannot identify employees who continued to receive pay increases based on cold-calls or raises due to pressure from non-Defendant rival employers. And, it conflates the impact, if any, of the challenged agreements with the impact of concurrent agreements with similar terms that are not at issue in this case. The inability of Dr. Leamer's model to disentangle the impact of the alleged conduct at issue from the effect of independent events on compensation makes his damage model unreliable and entirely incapable of measuring the effect of the alleged conduct at issue.

The Nature of the Case

II.   The Nature of the Case

A.   The Alleged Conspiracy to Suppress Wages

8.   According to the Complaint, Defendants Adobe, Apple, Google, Intel, Intuit, Lucasfilm, and Pixar conspired to create "an interconnected web of express agreements" not to cold call each other's employees for the purpose of recruiting.[6] Plaintiffs define cold calling as including "communicating directly in any manner (including orally, in writing, telephonically, or electronically) with another firm's employee who has not otherwise applied for a job opening."[7] Plaintiffs claim Defendants conspired to suppress and did suppress compensation to "salaried technical, creative, and research and development employees" ("TCR employees") by agreeing not to cold call each other's employees.[8] Plaintiffs allege that "under competitive and lawful conditions, Defendants would use cold calling as one of their most important tools for recruiting and retaining skilled labor, and the use of cold calling among Defendants commonly impacts and increases total compensation and mobility of all Defendants' employees."[9]

9.   Named Plaintiffs in this case are Michael Devine, a former software engineer for Adobe; Mark Fichtner, a former software engineer for Intel; Siddharth Hariharan, a former software engineer for Lucasfilm; Brandon Marshall, a former software engineer for Adobe; and Daniel Stover, a former software engineer for Intuit.[10] The named Plaintiffs seek to represent a nationwide Class of "salaried technical, creative, and research and development employees who worked for any Defendant while that Defendant participated in at least one anti-solicitation agreement with another Defendant" and seek damages allegedly resulting from any loss of compensation they suffered as a result of the agreements at issue.[11]

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[6] Consolidated Amended Complaint, *In re: High Tech Employee Antitrust Litigation*, Case No. 5: 11-CV-2509-LHK, September 2, 2011 ("Complaint") ¶¶ 55, 58–9, 73, 79, 85, 98, and 104. The Plaintiffs' Supplemental Answers and Objections to Defendants' Second Set of Interrogatories describe the agreements for which the Plaintiffs seek damages. (Plaintiffs' Supplemental Answers and Objections to Defendants' Second Set of Interrogatories, May 24, 2013 ("Plaintiffs' Supplemental Answers to Interrogatories").) Intuit, Lucasfilm, and Pixar have entered into settlement agreements with the Plaintiffs. (Order Granting Plaintiffs' Motion for Conditional Class Certification and Preliminary Approval of Partial Class Action Settlements with Defendants Intuit Inc., LucasFilm, Ltd., and Pixar, Approving Form and Manner of Notice, and Scheduling Final Approval Hearing, October 30, 2013.)

[7] Complaint, ¶ 41.

[8] Complaint, ¶¶ 108 – 10. ("Defendants entered into, implemented, and policed these agreements with the knowledge of the overall conspiracy, and did so with the intent and effect of fixing the compensation of the employees of participating companies at artificially low levels.")

[9] Complaint, ¶ 54.

[10] Complaint, ¶¶ 16 – 20.

[11] Order Granting Plaintiffs' Supplemental Motion for Class Certification, p. 10 and Complaint ¶¶ 123 and 126.

The Nature of the Case

10.   The alleged agreements are between pairs of Defendants that purportedly restricted recruiting between the parties to each agreement. I understand that the agreements at issue in this litigation consist of the following: Adobe-Apple; Apple-Pixar; Apple-Google; Google-Intel; Google-Intuit, and Lucasfilm-Pixar.[12] According to Dr. Leamer's analysis, these agreements became effective May 2005, April 2007, February 2005, March 2005, June 2007 and pre-2000, respectively, and enforcement of all the agreements at issue ended in March 2009.[13] Dr. Leamer's October 2012 report listed additional agreements between Pixar-Intel, Apple-Intel, Apple-Intuit and Apple-Lucasfilm.[14] However, Dr. Leamer has dropped these agreements from his analysis in his merits report, presumably because Plaintiffs do not challenge these agreements. Finally, it is my understanding from counsel that Intel's participation in a DNCC agreement with Google may have begun in spring of 2006, as opposed to spring of 2005, and that until the spring of 2006, there was no bi-lateral agreement between Google and Intel, only a unilateral decision by Google to stop cold calling Intel.[15]

11.   I understand that some of the agreements at issue in this litigation are characterized as informal, unwritten agreements in which senior management in certain pairs of Defendant companies allegedly agreed not to cold-call each other's employees.[16]

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[12] It is my understanding that certain allegations by Plaintiffs indicate that the Google-Intuit agreement only consisted of an agreement that Google not cold call Intuit employees, with no agreement prohibiting Intuit from calling into Google. However, I am assuming for the purposes of this report the broadest potential scope of Plaintiffs' claims with respect to Google-Intuit (i.e., that it was a reciprocal agreement), without verifying or testing that assumption. See Plaintiffs' Notice of Motion and Motion for Class Certification, and Memorandum of Law in Support, *In re: High-Tech Employee Antitrust Litigation*, Case No.: 5:11-CV-02509-LHK, October 1, 2012, p. 13 (Intuit Chairman Bill Campbell "also insisted that Google agree not to recruit Intuit employees.") and Plaintiffs' Supplemental Motion and Brief in Support of Class Certification, *In re: High-Tech Employee Antitrust Litigation*, Case No.: 5:11-CV-02509-LHK, May 10, 2013, p. 9 ("Mr. Campbell 'requested that Intuit be added fully to the Do Not Call list'… Google agreed to Mr. Campbell's request.")

[13] Leamer October 2012 Report, p. 9. For the purposes of this report, I take the agreement dates identified by Dr. Leamer in his October 2012 report as given, except where noted. However, there appear to be unexplained disparities between the dates he provides in his October 2012 and his October 2013 report. For the purposes of the analyses in this report, I take the dates as set out in Dr. Leamer's regression data as given, unless otherwise noted. Dr. Leamer notes that the Apple-Pixar agreement may have begun prior to 2005 but states that he does not use this date due to lack of supporting evidence. (Leamer October 2013 Merits Report, FN 4.) In addition, Plaintiffs' Supplemental Answers and Objections to Defendants' Second Set of Interrogatories provide some dates for the agreements that differ from those provided by Dr. Leamer. (Plaintiffs' Supplemental Answers to Interrogatories.)

[14] Leamer October 2012 Report, pp. 9 – 10.

[15] I understand that the earliest documentation of an agreement between Intel and Google is a May 2006 email between Paul Otellini, CEO of Intel, and Eric Schmidt, CEO of Google. (Email exchange "FW: recruiting," between Paul Otellini and Eric Schmidt, May 2006, GOOG-HIGH-TECH-00058864.) Mr. Otellini testified that his May 2006 email followed a telephone call that he had with Mr. Schmidt earlier in the spring of 2006, where Mr. Otellini asked Mr. Schmidt not to cold call Intel's employees who were working on collaborations with Google and that Mr. Schmidt agreed. (Otellini Dep. 74 – 76 and 111 – 16).

[16] Email exchange "Re: Apple – Possible Target," between Ray Tum at Adobe and Martin Bruce at Adobe, May 2006 ("Apple Possible Target"), ADOBE_007186 in ADOBE_007186 – 7; Email exchange "Apple gentleman's agreement," between Lori McAdams at Pixar and recruiting divas at Pixar, April 2007 ("Apple-Pixar agreement outline"), PIX00003419 and Email exchange "Re: Pixar agreement," between Jan van der Voort at Lucasfilm and Sharon Coker at Lucasfilm and BZ Petroff at Lucasfilm, April 2007 ("Pixar agreement"), LUCAS00013507. Internal Intel emails describe the Intel-Google

As such the understanding and implementation of the terms and restrictions of the agreements at issue may vary from agreement to agreement and may, in fact, even differ between the two parties to each agreement.

B.   Dr. Leamer's Theory of Impact

12.   Dr. Leamer was retained by Plaintiffs to assess impact and damages to the Class allegedly resulting from the DNCC agreements. Dr. Leamer opines that the DNCC agreements reduced the information available to Class members about their market worth and allowed Defendants to undercompensate the Class relative to what Class members would have earned absent the DNCC agreements.

13.   Dr. Leamer characterizes the process by which employees and employers determine labor contracts when there is imperfect information about the prices being negotiated in the market as a process of "price discovery."[17] He claims that "[m]embers of the Class work in a market characterized by imperfect information," with the employee having less information than the firm about market wages.[18] Dr. Leamer argues that the DNCC agreements suppressed an important source of information about market wages and negatively impacted the employees' compensation by allowing the Defendants to undercompensate their employees with less fear of losing them to competitors.[19]

14.   According to Dr. Leamer, "when employees discover information regarding their labor's value by receiving an offer from a competing employer, those employees use that information to negotiate higher salaries at their current employer."[20] Under this theory, with less information allegedly flowing in to employees through cold calls, employees would allegedly be less informed about their market worth and unable to negotiate as strongly for compensation commensurate with their worth.

15.   Dr. Leamer states the impact of foregone cold calls affects the wage structure of the entire firm through the "force of internal equity."[21] According to Dr. Leamer,

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agreement as an "unofficial no poaching policy" and a "handshake 'no recruit.'" (Re: fyi, 76526DOC000007 and Email chain "Re: global gentleman agreement with Google," between Intel employees, September 2007 ("Re: global gentleman agreement with Google"), 76526DOC000011 in 76526DOC000011 – 4.) While Plaintiffs allege other restrictions, the common alleged restriction in the agreements was an alleged promise not to cold call.

[17] Leamer October 2013 Merits Report, ¶¶ 11 – 12.

[18] Leamer October 2013 Merits Report, ¶¶ 11 – 12.

[19] Leamer October 2013 Merits Report, ¶¶ 9 and 12. ("There can be a normal asymmetry in information that works in favor of employer, since employees may have little or no direct access to the nature of contract offered and accepted by other similar workers either at their own firm or other firms, and workers may rely mostly on "water-cooler talk" perhaps supplemented by Internet sources…Cold calling is an important channel of information about outside opportunities that can help employees become better informed and better paid.")

[20] Leamer October 2012 Report, ¶ 113.

[21] Leamer October 2013 Merits Report, ¶ 14.

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"internal equity puts boundaries on the degree to which pay of different employees can diverge, and tends to require maintenance of a somewhat rigid compensation structure."[22] That is, under Dr. Leamer's theory, when one employee negotiates higher compensation, firms are allegedly pressured to raise compensation for all employees, such that information from cold calls has a "ripple effect" that causes the increase in compensation to be propagated through the Defendants' "somewhat rigid" compensation structures.[23]

16.   Dr. Leamer further alleges that the ripple effect occurs both reactively and preemptively. As employees learn from each other that others received an increase in compensation, they put pressure on the employer to "match compensation increases broadly."[24] According to Dr. Leamer the adherence to a "rigid salary structure" helps keep employees loyal to the firm.[25] Dr. Leamer also alleges that even the potential for a "burst" of cold calls from a recruiting company causes firms to preemptively increase compensation to employees to prevent them from leaving to competitors.[26] These preemptive increases "reduce or eliminate" the effectiveness of future cold calls to the firm's employees.[27] By preventing cold calling through the DNCC agreements, Dr. Leamer alleges the Defendants bypassed this pressure to reactively and preemptively increase compensation and negatively impacted the entire Class.[28]

17.   Finally, Dr. Leamer suggests that "profit-sharing" between the firm's top management and its key employees was reduced during the Class period.[29] According to Dr. Leamer's profit sharing theory, firms share profits with key employees that possess critical firm-specific knowledge to prevent them from

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[22] Leamer October 2013 Merits Report, ¶ 14.

[23] Leamer October 2012 Report, ¶ 120. ("A firm's commitment to principles of 'internal equity' is evidenced by the imposition and maintenance of a somewhat rigid salary structure. What that means is that Cold-Calling and related practices would be expected to increase compensation across the board rather than be narrowly focused on the skills that are most in demand at any point in time.")

[24] Leamer October 2012 Report, ¶ 114. ("…[T]hose individuals tell others at their employer, who then 'resent[]' the perceived 'unfair jump' in pay, increasing pressure to match compensation increases broadly.")

[25] Leamer October 2012 Report, ¶ 101. ("…[E]conomic theory implicating firm incentives to maintain worker loyalty by adhering to principles of internal equity through a rigid salary structure….")

[26] Leamer July 2013 Rebuttal Supplemental Report, ¶¶ 3 – 4 and 24 ("Preemptive adjustments are intended to minimize the damage that attractive cold calls might cause to the behavior of not just the individuals who (in the but-for world) would have been cold-called–but also the broad swath of employees whose loyalty might be diminished by knowledge of better opportunities via cold calls received by their colleagues."); Leamer May 2013 Supplemental Report, ¶ 15 and Leamer October 2012 Report, ¶ 105.

[27] Leamer October 2013 Merits Report, ¶ 8.

[28] Leamer October 2012 Report, ¶ 82. ("Documents reveal that the defendants would otherwise have been competing for employees. In the absence of these agreements, Defendants would have cold called one another's employees.")

[29] Leamer October 2012 Report, ¶ 97.

Background

leaving and taking that knowledge away from the firm.[30] By suppressing workers' information about outside opportunities, Dr. Leamer alleges that the Defendants decreased the need to share profits with critical employees, allowing the firms' top management to potentially keep a larger share of the firms' profits during the Class period.[31]

18.   The theories on which Dr. Leamer relies to establish impact and damages are flawed and unsupported by his data or analyses. There is no evidence to support Dr. Leamer's assertion that the impact of the DNCC agreements at issue was widespread or can be properly measured by the methods or models used by Dr. Leamer. To the contrary, data and information produced in this case indicate that information flow during the Class period was not impeded in any meaningful fashion. Overall hiring (and the attendant information flow from all sources) increased at the Defendant firms over the Class period as did average compensation to employees. The damage results obtained by Dr. Leamer are the result of fundamental flaws in his model and the failure of his model to account for individualized compensation factors for each firm, such as each firm's reaction to the economic slowdown in 2008 and 2009 and many other firm-specific factors.

III.   Background

A. Defendants' Compensation Practices

19.   This section explores overall compensation trends and practices at each Defendant firm. I detail the types of compensation granted to each Defendant's TCR employees and explore events that had a noticeable impact on compensation at each of these firms, as shown by the data and in Defendants' documents. The data and documents show that total compensation and average compensation per Class member at each Defendant firm tended to increase throughout the Class period, and that a variety of events occurred throughout this period that impacted Defendants' compensation, independently of the DNCC agreements at issue.

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[30] Leamer October 2012 Report, ¶¶ 78 – 9 and 97. ("Equity grants and profit sharing are used to promote employee loyalty and retain firm-specific knowledge assets....")

[31] However, Dr. Leamer acknowledged in deposition that possible savings from the alleged suppression of compensation could be invested in new capital, research and development, or hiring more people, rather than be given to top management or the principals of the companies. Deposition of Dr. Edward Leamer, November 18, 2013 ("Leamer Deposition Vol. III."), pp. 973 – 6. ("Q. Is that your opinion that in this case, the defendants kept more of the profits for the firm's principals and top management? A. Yes, that is. So the damages that I refer to are wages that would, absent the agreement, have accrued to workers…Q. But it doesn't necessarily follow that if there is a savings because of your alleged suppression of compensation, that the savings go to the principals and top management… Q. …But it could go into plant investment, research and development? A. It could. It could. Q. It could go into hiring more people. It could go into any cash needs that the company has; right? A. Yes, it could.")

Background

1. Adobe

a. Compensation Overview

20.   **Exhibit III.1** shows the total number of TCR employees employed by Adobe annually from 2001 to 2011. As can be seen from the chart, Adobe gained over 1,000 TCR employees between 2001 and 2011. The biggest growth year for Adobe was 2005, when Adobe acquired Macromedia, adding 655 TCR employees to Adobe's total.[32] Between 2005 and 2009 Adobe acquired 13 additional companies further expanding the number of Class members it employed during the Class period.[33] ███[34]

21.   ███
███

      ██████   (**Exhibit III.2**). Adobe's average compensation per Class member generally mirrors the pattern in total compensation expenditure, as shown by **Exhibit III.3**.
██
██
██ .

b. Compensation Components

22.   ██
██
██[36]

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[32] Dr. Leamer's Adobe compensation data. According to Ms. Morris, the acquisition of Macromedia led to approximately 1,200 employees (both technical and non-technical) being added to Adobe's headcount. (Declaration of Donna Morris, Senior Vice President, Global Human Resources, at Adobe, November 9, 2012 ("Morris Declaration"), ¶ 35.)

[33] Morris Declaration, ¶ 36. ("After Macromedia, Adobe continued to make acquisitions, including the acquisition of Navisware…TTF, Pixmantec, Interakt, Amicima, Serious Magic, and Antepo…Scene7 and Virtual Ubiquity… Meer Meer and Yawah… and Business Catalyst and Omiture….")

[34] Email Exchange, "IMPORTANT INFORMATION – Requisition and Offers," between Donna Morris at Adobe and ████ ██████████ ADOBE_013339 in ADOBE_013339 – 40. ██████████████████████████████
████████████████████ See also "Human Resources Organizational Update," Adobe, 2009, ADOBE_014770 in ADOBE_014769 – 78. ██

[35] Morris Declaration, ¶ 5.

[36] Morris Declaration, ¶ 5.

Background

23.   [REDACTED]   Before 2007, this process was
completed annually every June, and adjustments to merit increases were made at
this time.[42]   Starting in fiscal year 2007, Adobe changed the timing of the Focal
Review Process to be completed annually by February 1.[43]

24.   [REDACTED]

[REDACTED][44]   The merit budget for base salary increases grew from 4 percent to 5.5
percent between 2004 and 2008.[45]   In addition, from 2004 to 2006, Adobe targeted
base salary for its non-sales employees at the 50th percentile of the market base
salary, as determined by the Radford survey and others.[46]   Adobe increased its base

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[37] Morris Declaration, ¶ 4. (" [REDACTED] ")

[38] Morris Declaration, ¶¶ 12 and 19.

[39] Morris Declaration, ¶ 19. (" [REDACTED] .")

[40] Morris Declaration ¶ 10.

[41] For examples of calculating merit-based salary increases, see "2005 Performance, Salary & Stock Focal," Theresa Townsley, Donna Morris, and Ellen Swarthout, Adobe, February 2005, (Exhibit 1 to the Morris Declaration), p. 19 and "2007 Mini Performance Focal: Manager Training," Adobe, November & December 2006 ("Adobe 2007 Mini Performance Focal: Manager Training"), (Exhibit 2 to the Morris Declaration), ADOBE_23747, p. 20.

[42] For example, see "2004 Performance, Salary and Stock Focal: Manager Training," Adobe, March/April 2004 ("Adobe 2004 Focal"), ADOBE_007690, slide 5. ("Salary changes are effective June 1, 2004 and will be reflected in the first paycheck after June 1, 2004.") See also Adobe 2007 Mini Performance Focal: Manager Training, pp. 7 – 8.

[43] Due to the change in timing of the review process, the 2007 focal review completed February 1, 2007 was an update of the review completed in June 2006. ("Focal 2007," Adobe, October 5, 2006, ADOBE_015024, slide 2.) See also Adobe 2007 Mini Performance Focal: Manager Training, pp. 7 – 8 and Morris Declaration, ¶ 27. ("Prior to 2007, the annual base salary, bonus, and equity grant adjustments became effective June 1st. In 2007 Adobe shifted its model to align the review period with the end of the fiscal year, making… adjustments effective on February 1st.")

[44] See **Exhibit III.2** and **Exhibit III.3**.

[45] Adobe 2004 Focal, slide 12; "Adobe: Focal 2005," Adobe, December 13, 2004 ("Adobe 2005 Focal"), ADOBE_008623, slide 7; "2006 Performance, Salary & Stock Focal," Adobe, February 2006 ("Adobe 2006 Focal"), ADOBE_015840, slide 10 and "Annual Review 2008 Global Market Analysis: Compensation," Adobe, November 12, 2007 ("Adobe Annual Review 2008"), ADOBE_018730, slide 4.

[46] See Adobe 2004 Focal, slides 8-10; Adobe 2005 Focal, slide 7 and Adobe 2006 Focal, slide 20. I am not opining about the relevant market for labor. Defendants' documents show that the "market" is the term consistently used in relation to their

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salary target to the 65th percentile starting in 2008.[47] **Exhibit III.4** illustrates average base salary before, during, and after the Class period.

25.

26. **Exhibit III.5** shows average bonus payments to TCR employees by year. As can be seen from the exhibit, average bonus payments show more variability than base pay, including large increases in 2007 and 2008. These increases in average bonus

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benchmarking process and it reflects the numerous peer companies with which each Defendant believes it competes for labor. I also note that Plaintiffs have acknowledged that the Defendants compete for talent with more non-Defendant firms than Defendant firms. (Deposition of Edward Leamer, Ph.D., Vol. I, October 26, 2012 ("Leamer Deposition Vol. I"), pp. 33 - 34.) See also, Leamer Deposition Vol. I., p. 79. ("Q. So let me ask you to look at the data you do have that you cited in your own report. And, once again, the number of talent acquired and talent lost, the vast majority comes from nondefendants, correct?... A. The majority definitely does.")

[47] Adobe Annual Review 2008, slide 4.

[48]

[49] Morris Declaration, ¶¶ 24 and 26; Arriada-Keiper Deposition, pp. 29 and 237 and "2006 Total Target Cash Analysis: Compensation," Adobe, September 2006 ("Adobe 2006 Total Target Cash"), ADOBE_015405, slides 11-16

[50] Adobe 2006 Total Target Cash, ADOBE_015405, slide 16.

[51] Adobe 2006 Total Target Cash, slide 15.

[52] Morris Declaration, ¶ 26. ("   ")

[53] Morris Declaration, ¶¶ 24 and 27. For examples of Adobe's AIP/QIP payout determination, see "Performance-based Restricted Stock Unit Program" FY'07 Incentive Program Updates," Adobe, February 15, 2007 ("Adobe FY'07 Incentive Program Updates"), (Exhibit 3 to the Morris Declaration), ADOBE_015059, pp. 23 – 24.

[54] Morris Declaration, ¶ 29. ("Adobe's retention and counteroffer practice has always been that managers should rarely pay someone more in an effort to retain them.")

coincide with revisions in Adobe's bonus formula.[55] ███████████
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27.   ██
████████████████████████ **Exhibit III.6** illustrates average cash compensation to
TCR employees by year. ██████████████████████████████████
███ .

28.   Adobe also offers equity awards as part of its compensation package. ████████
██ TCR
employees are granted equity during the annual Focal Review Process discussed
above. ██
██
██
██
██████████████████████████ **Exhibit III.8** shows the average value of the
combined types of equity awards over the period of study. As can be seen from the
chart, ██

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[55] See **Exhibit III.5**. For examples of AIP/QIP payout changes between 2006 and 2007, see Adobe FY'07 Incentive Program
Updates, pp. 17 – 26. ████████████████████████████████████
█████████████████████████ .

[56] Morris Declaration, ¶ 26.

[57] Email exchange "FW: Total Rewards Strategy of Program Modifications," between Donna Morris at Adobe and employees at
Adobe, September 2009, ADOBE_009493 in ADOBE_009493 – 4. (██████████████████████████
██
███████████████████████████████████ ")

[58] Adobe 2006 Total Target Cash, slide 5. (██████████████████████████████████████
██████████████████████)….") ██████████████████████████ . (Morris Declaration, ¶ 24.)

[59] Morris Declaration ¶ 25. ("██
███ "). For an
example of the mix of equity grants awarded to different experience levels, see Adobe FY'07 Incentive Program Updates, ,
slide 10.

[60] Adobe FY'07 Incentive Program Updates, slide 11. ("████████████████████████████████████
██████████████████ .") See also Adobe FY'07 Incentive Program Updates, slide 13. ("██████████
████████████████████████ ")

███

2. Apple

a. Compensation Overview

29.   The total number of TCR employees employed by Apple increased steadily during the relevant period, almost tripling in count between 2001 and 2011, as shown by **Exhibit III.9**. Apple expanded its TCR workforce by 51 percent during the alleged Class period, from 2005 to 2009.

30.   Between 2001 and 2011, ████████████████████████████████████ ██, as shown by **Exhibit III.10**. ████████████████████████ **Exhibit III.11** shows the average compensation ████████████████████████

b. Compensation Components

31.   Total employee compensation at Apple is composed of: base salary, a variety of bonuses, and two forms of equity grants (stock options and RSUs).[62]

32.   In setting the base salaries of its employees, ████████████████████ ██ ██████████ ███ ██████████[64]██ ██.   Each year, Apple sets a compensation budget, and managers are responsible for determining

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[61] Dr. Leamer's Adobe compensation data.

[62] Declaration of Steven Burmeister, Senior Director of Compensation at Apple, November 12, 2012 ("Burmeister Declaration"), ¶ 3.

[63] Burmeister Declaration, ¶¶ 4 and 6.

[64] Burmeister Declaration, ¶ 4. ("In 2009, for example, Apple identified the following as peer companies for compensation purposes: Amazon.com, Inc., AT&T Inc., Cisco Systems, Inc., Comcast Corporation, Dell Inc., DIRECTV, eBay Inc., EMC Corporation, Google Inc., Hewlett-Packard Company, Intel Corporation, International Business Machines Corporation, Microsoft Corporation, News Corporation, Oracle Corporation, QUALCOMM Incorporated, Texas Instruments Incorporated, Time Warner Inc., Verizon Communications Inc., The Walt Disney Company, and Yahoo! Inc.")

[65] "Compensation," Apple Presentation for Recruiters, May 2006 ("Apple Compensation Presentation"), 231APPLE021326 in 231APPLE021322 – 34. ("██ ██████████████████████████.")

Background

the compensation of those they supervise based on merit and needs of the individual group.[66] Each manager allocates salary increases within his or her budget.[67] The market data utilized by Apple also help determine the annual compensation budgets.[68] ██
██

33.   Salaries at Apple are reviewed annually, and eligible employees are considered for an annual merit increase.[70] As of at least 2005, annual merit increases were effective in early December.[71] The percentage increases ranged from ████████ percent and were determined by an employee's performance rating.[72] The ██████████
██ , as shown by **Exhibit III.12**.

34.   Apple also provides a variety of cash and equipment bonuses to its employees. These include an annual performance bonus as well as ████████████████
██████████████████s, among others.[73] As of at least 2006, the annual performance bonus was ██
██
████████████████████" **Exhibit III.13** shows the average bonus paid to Apple TCR employees from 2001 through 2011. ████████████████████████
██████████████████████████████   **Exhibit III.14** shows that the average cash compensation (i.e., includes base salary plus bonuses) to Apple TCR employees ████████████████████████████████████ .

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[66] Burmeister Declaration, ¶¶ 3 and 7.

[67] Burmeister Declaration, ¶ 7.

[68] Burmeister Declaration, ¶ 6.

[69] ██
██
█████████████████████████████████t. ("Human Resources Manager Briefing," Fall 2005 ("Apple Manager Briefing"), 231APPLE094053 in 231APPLE094041 – 67.)

[70] Apple has adjusted its compensation budget annually for the last eight years, and adjusted them "periodically" prior to that. █
██ (Burmeister Declaration, ¶ 4 and "Total Rewards Planning, FY07," Apple, 2006 ("Apple Total Rewards Planning"), (Exhibit C to the Burmeister Declaration), 231APPLE095049 in 231APPLE095044 – 63.)

[71] Apple Manager Briefing, 231APPLE094943 in 231APPLE094041 – 67.

[72] Apple Manager Briefing, 231APPLE094950 in 231APPLE094041 – 67.

[73] Dr. Leamer's Apple compensation data.

[74] Apple Total Rewards Planning, 231APPLE095048.

35.   Equity awards, in the form of stock options and RSUs, constitute an additional component of compensation to Apple employees.[75] Apple's documents and data suggest that stock options ███████████████████████████████ ████████████████████████████. Annual stock awards also appear to be part of the annual increase in compensation package, and █████████████████████████ ███████████████████████[77] █████████████████████████████████████ ███████████████████████████. Apple's compensation data suggests that ████████████████████████████[79]

36.   **Exhibit III.15** and **Exhibit III.16** show that █████████████████ ██ ██ ██ ██ ████████████████████.

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[75] Burmeister Declaration, ¶ 3. Apple also offers an employee stock purchase plan. ("Form DEFR14A," Apple, January 26, 2010, (Exhibit A to the Burmeister Declaration), p. 22.)

[76] Apple Compensation Presentation, 231APPLE021331. ("██████████████████████████████ ██ ████████████████████████")

[77] Apple Total Rewards Planning, 231APPLE095048. (████████████████████████████████ ██ ████████████████████████████████████")

[78] As of 2006, ██ ██████████████████████████████████ (Apple Total Rewards Planning, 231APPLE095049 and Apple Compensation Presentation, 231APPLE021330.)

[79] Dr. Leamer's Apple compensation data. Dr. Leamer's compensation data suggests ██████████████ ██ ████████████████████████████

[80] See **Exhibits III.11 – III.16**.

[81] Apple's fiscal year ("FY") closes on September 30, and therefore, the fair value prices reported for a given FY cover only nine out of 12 months of the same calendar year. The three remaining months of the calendar year are evaluated at the fair value prices of the next fiscal year. ██ ██ (Dr. Leamer's regression data.)

3.   Google

a.   Compensation Overview

37.   From 2001 to 2011, the number of Google's TCR employees increased more than 100-fold as it went from a California technology startup to a publicly traded company.[82]   **Exhibit III.17** shows the growth in Google's TCR employees between 2001 and 2011.

38.   As its TCR workforce grew, Google's total expenditure on TCR employee compensation also increased on an annual basis, with the exception of 2008, as shown by **Exhibit III.18**. Between 2005 and 2009, total compensation received by the Class grew by ▮▮▮▮▮▮. Google's average compensation per TCR employee shows greater volatility than the other firms studied. As shown by **Exhibit III.19**, average compensation of TCR employees ▮▮▮▮▮▮ between 2002 and 2003. While Google's average compensation per Class member shows substantially more variability during the Class period, overall, its average compensation remains generally higher than that of the other Defendants.

b.   Compensation Components

39.   Google's total employee compensation is composed of: base salary, annual employee bonus, and two forms of equity grants (stock options and Google Stock Units, "GSUs," which are similar to restricted stock units).[83]

40.   In setting the base salary of its employees, Google conducts an annual market benchmarking process ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮ ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮ Over time, Google has raised its target market benchmark percentiles for cash compensation using wage surveys. Prior to 2007, Google targeted cash compensation around the ▮▮▮▮▮▮ of the market, and increased this target to the ▮▮▮▮▮▮ in 2007. In 2011, Google increased the target further to the ▮▮▮ percentile of the benchmark data.[85] ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮

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[82] Google filed their IPO in August of 2004, offering 19,605,052 shares of Class A Common Stock at an opening price of $85 a share. ("Our history in depth," Google ("Google History") available at http://www.google.com/about/company/history/#2004, accessed on November 9, 2013.)

[83] Declaration of Frank Wagner, Director of Compensation at Google, November 9, 2012 ("Wagner Declaration"), ¶¶ 5 and 25. GSUs are similar to restricted stock units, but differ in that "as long as units are unvested, holders are not entitled to voting rights or dividends, if any." (Google's Hiring Policies and Protocols, December 17, 2007 ("Google's Hiring Policies and Protocols"), GOOG-HIGH TECH-00023555 in GOOG-HIGH-TECH-00023500 – 601.)

[84] Wagner Declaration, ¶¶ 6 – 7.

[85] Deposition of Frank Wagner, Director of Compensation at Google, March 7, 2013 ("Wagner Deposition"), pp. 39 – 40. ("A… ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮

Background

41. ██

42. **Exhibit III.20** shows average base salary per TCR employee at Google between 2001 and 2011. Average base salary increased annually for Class members in the relevant period with the exception of a slight drop in 2006. The decrease in average base salary in 2006 is concurrent with a change in the mix of employees in 2006 relative to 2005. The Class members who left Google after 2005 were higher paid on average relative to those who stayed and the new hires in 2006, which lowered the average salary in 2006.[92]

████ █████████████████████ ██ ████████████████████ . It was decided in 2010 we would change the compensation philosophy for implementation at the beginning of 2011…Moving from targeting the ██ percentile of the market to targeting—for cash compensation to targeting the market ████ ███████████ See also "Rewarding Talent: Compensation," Google ("Google Rewarding Talent: Compensation"), GOOG-HIGH-TECH-00195943.pptx, slide 13. ███████████████████████████████████████

████████ (Wagner Deposition, pp. 47 – 8 and 56 – 7.)

[86] Wagner Declaration, ¶¶ 7 – 8. ████████████████████████████

[87] Wagner Declaration, ¶ 7. ████████████████████

[88] Wagner Declaration, ¶ 15.

[89] Deposition of John Schirm, Compensation Manager at Google, June 29, 2012, p. 97 and "Salary Planning 2007 Presentation to Engineering Managers," Google, October 30, 2007, (Exhibit A to the Wagner Declaration), GOOG-HIGH TECH-00255218.000007 in GOOG-HIGH TECH-00255218.000001 – 16.

[90] Wagner Declaration, ¶ 15 and Rewarding Talent: Compensation, slide 16.

[91] "Salary Benchmarking Overview, Google's Compensation Philosophy & Deep Dive into Benchmarking," Google, April 2009, (Exhibit B to the Wagner Declaration), GOOG-HIGH TECH-00302552.000011 in GOOG-HIGH TECH-00302552.000001 – 13 and Wagner Declaration, ¶ 15.

[92] Dr. Leamer's Google compensation data.

Background

43.   Google offers a variety of bonus programs, the largest being the annual performance bonus.[93] ███████████████████████████████████████

44.   **Exhibit III.21** presents Google's average cash bonus per employee by year, which generally increased over the relevant period. Similarly, **Exhibit III.22** shows average cash compensation to Google's Class members generally trending upward throughout the relevant period.

45.   Effective January 1, 2011, Google implemented a program referred to as the "Big Bang," which entailed large cash compensation increases for all employees.[97] Google began benchmarking its employee cash compensation to the ███ percentile of the market values, as indicated by market surveys.[98] The company also implemented a one-time, 10 percent salary increase for all employees, which is reflected in **Exhibit III.20**.[99] ███████████████████████████████

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[93] ██ (Wagner Declaration, ¶¶ 17 – 23.)

[94] Wagner Declaration, ¶¶ 19 – 20. ████████████████████████████████████ (See Google Rewarding Talent: Compensation, slide 27 notes and Katie Temple and Krystal Cope, "Preliminary 2010 Cash Incentive Plan Funding," January 12, 2011, 76616DOC005995 in 76616DOC005993 – 6000.)

[95] ███. (Wagner Declaration, ¶ 33.)

[96] Google Rewarding Talent: Compensation, slide 22. A document from 2007 states that bonuses will be paid "typically in late February or early March." (Google's Hiring Policies and Protocols, GOOG-HIGH TECH-0023553.)

[97] It is my understanding that the Big Bang ████████████████████████████████ See 2011 Compensation Staffing Training, Google, November 2010 ("Google 2011 Compensation Staffing Training"), GOOG-HIGH-TECH-00195512, slides 6 – 7 and Wagner Declaration, ¶¶ 32 – 3. See Wagner Deposition, pp. 212 – 3. ("Q. And was Project Big Bang what we were talking about earlier, the project that changed Google from having one compensation philosophy to another one? A. Yes, it is the project that ████████████████████████████ ")

[98] Wagner Deposition, p. 40.

[99] Wagner Declaration, ¶ 33.

[100] Wagner Declaration, ¶ 33. ██

Background

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████████████████████████████████████ Google hoped to reduce attrition to start-up competitors such as Facebook, Twitter, and Groupon.[103]

46.   Google also compensates its TCR employees with equity awards. ██████
██
██
██
██
██

██ (Google 2011
Compensation Staffing Training slide 7.)

[101] "Project Big Bang, Revised Comp Proposal," Google, September 7, 2010, GOOG-HIGH-TECH-00194962.pptx, slide 1 and "2010 Bonus Cycle, Manager Training," Google, GOOG-HIGH-TECH-00057190.pptx, slide 10.

[102] Google 2011 Compensation Staffing Training, slides 6 – 7 and 24 and Wagner Declaration, ¶¶ 32 – 3. (████
██
██
██████████████████████████ … Google decided to raise all employee salaries by 10% effective January 1, 2011.")

[103] Wagner Declaration, ¶ 33 and Competing with Startups: Facebook Case Study, January 10, 2010, GOOG-HIGH-TECH-00450451 – 5.

[104] "██
██████████████ (Wagner Declaration ¶ 25.) ██████████████
████████████████████████████████████ (Google Rewarding Talent: Compensation, slides 30 and 42 and Wagner Declaration, ¶ 22.)

[105] Wagner Declaration, ¶ 26. ████████████████████████████
██
██████████████████████ (Google's Hiring Policies and Protocols, GOOG-HIGH TECH-00023559.)

[106] Wagner Declaration, ¶ 25. All worldwide Google employees are eligible for consideration, so long as they meet the criteria of "consistently exceeding expectations [emphasis not included] and have been with Google for at least a year." Google's Executive Management Group (EMG) decides which employees receive refresher grants. (Google's Hiring Policies and Protocols, GOOG-HIGH TECH-0023558.)

[107] Wagner Declaration, ¶ 25.

[108] Dr. Leamer's Google compensation data. A document regarding Google's hiring policies from 2005 states "we expect grants to occur at the end of August." (Google's Hiring Policies and Protocols, GOOG-HIGH TECH-0023559.)

Background

47.   In 2007, Google gave ███
        ███
        ███████████████████████████
        ███████████████████████████████████████

48.   **Exhibit III.23** shows the average value of equity by type per Google TCR
        employee over the relevant period. **Exhibit III.24** suggests that the volatility of
        average compensation to Google TCR employees is largely driven by the value of
        equity grants. The average values of GSUs/RSUs and stock options throughout this
        period are highly volatile, with movement including a large increase in 2007
        preceded and followed by years of decreases, including a decrease in 2006 that is
        the source of a decrease in average total compensation in that year. Average equity
        values also decreased in 2008 coinciding with a drop in RSU fair value price from
        $619 in 2007 to $473 in 2008.[111]

4. Intel

a. **Compensation Overview**

49.   Between 2001 and 2011, the size of Intel's TCR workforce, the largest of all the
        Defendants, expanded and contracted by thousands of employees, as shown by
        Exhibit III.25. Major changes to the number of Intel's TCR employees are a result
        of the dot-com collapse in the early 2000s, a reorganization that added 4,000 TCR
        employees in 2005, a hiring freeze and layoffs in 2006, and the acquisitions of
        McAfee and Infineon in 2011. [112]

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[109] Letter to Art and Paul from Lazlo at Google, GOOGLE-HIGH-TECH-00519081 – 2 in GOOGLE-HIGH-TECH-00519081 –
    91. ("███
    ███
    ███████████████████")

[110] Email exchange, "Proposed Google response to increasing talent pressure," between Laszlo Bock at Google and others,
    November 2007 ("Email Exchange re: Proposed Google response to increasing talent pressure"), GOOG-HIGH-TECH-
    00519070.R in GOOG-HIGH-TECH-00519070.R – 80.R. ("Google has come under intense and increasing talent pressure
    as key employees consider starting companies, and as Facebook continue to grow. I███████████████████████
    ███ GOOG-HIGH-TECH-
    00519071.R. ("███████████████████████████████)
    ████████████████████████████

[111] Dr. Leamer's regression data.

[112] "Intel 2001 Annual Report," 2001, available at http://www.intel.com/content/dam/doc/report/history-2001-annual-report.pdf,
    accessed on November 19, 2013, p. 1; Intel Corp., Form 10-K for the period ending December 31, 2005, p. 9; "Intel 2006
    Annual Report," 2006 ("Intel 2006 Annual Report"), available at http://www.intel.com/content/dam/doc/report/history-
    2006-annual-report.pdf, accessed on November 19, 2013, p. 3; and Intel Corp., Form 10-K for the period ending December
    31, 2011, p. 8. In 2006, revenues decreased by 9%, and operating profits were down by 53% from 2005. As part of the

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b. **Compensation Components**

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restructuring efforts, Intel temporarily halted new hiring in February before instituting a full hiring freeze in April 2006. (See Declaration of Danny McKell, Compensation and Benefits Specialist at Intel Corporation, November 12, 2012 ("McKell Declaration"), ¶ 15.) Between mid-2006 and the end of the year, Intel released 8,400 employees and expected to lay off an additional 2,100 employees by mid-2007, most of who are in the marketing and IT departments. (See Intel 2006 Annual Report, p. 3 and McKell Declaration, ¶ 15.) **Exhibit III.25** reflects the total number of employees who were employed at Intel at any time during the year; thus, since Intel implemented its restructuring in the middle of 2006, the resulting drop in headcount is reflected in the employee count in 2007.

[113] "Intel 2003 Annual Report," 2003, available at http://www.intel.com/content/dam/doc/report/history-2003-annual-report.pdf, accessed on November 19, 2013, p. 3.

[114] McKell Declaration, ¶ 3; Intel Employee Bonus (EB) Program Overview ("Intel EB Program Overview"), 76635DOC000021 – 2 and Intel Employee Cash Bonus Program Overview ("Intel ECBP Overview"), 76635DOC000023 – 4.

[115] Intel 2005 U.S. Focal Budget Manager Update Presentation, January 2005 ("Intel 2005 U.S. Focal"), 76603DOC000013 in 76603DOC000001 – 13; T-Comp at Intel 2006 ("Intel 2006"), 76633DOC004102-3 in 76633DOC004093 – 4118; Intel Pre-Focal Analysis 2007, January 5, 2007 (Exhibit D to the McKell Declaration), 76583DOC002007_000017 in 76583DOC002007_000001-31 and Intel HR Pre-Focal 2008 Preparation, January 2008, 76614DOC022676 in 76614DOC022664 – 92.

[116] Deposition of Danny McKell, Compensation and Benefits Specialist at Intel, March 20, 2013 ("McKell Deposition"), pp. 114 – 8. ("

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY   Background

53. ██

54. ██

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[117] McKell Declaration, ¶ 15. ("██.")

[118] McKell Declaration, ¶ 5.

[119] Intel Compensation 201, Instructors Guide, December 15, 2006, 76583DOC007708 – 13 in 76583DOC007683 – 725.

[120] McKell Deposition, pp. 100 – 102; Intel 2005 U.S. Focal, 76603DOC000005; and Intel 2006, 76633DOC004096.

[121] McKell Declaration, ¶ 15 and Intel 2010 Proxy Statement, April 2, 2010 ("Intel 2010 Proxy Statement"), p. 23, available at http://www.intc.com/intelProxy2010/compensation/executive/index.html. ("Due to the economic and market conditions at the beginning of 2009, annual merit increases to base salaries for the broad-based employee population and the executive officers were suspended. In addition, there were no annual merit increases granted in the incentive cash baseline amounts used under the Executive Officer Incentive Plan (EOIP) and the broad-based annual incentive plan to determine the amount of annual incentive cash payments…In 2010, merit increases to base salaries and incentive cash baseline amounts resumed for the broad-based employee population and the executive officers; similarly, promotions also resumed.")

[122] "U.S. Compensation and Benefits Overview for 2004," Intel, 0.7.79.2217586.1.1[1].ppt, slide 9; "U.S. Compensation and Benefits Overview for 2005," Intel, 0.7.79.2178337[1].ppt, slide 7; "U.S. Compensation and Benefits Overview for 2006," Intel, 0.7.79.2183957 [1].ppt, slide 8 and McKell Declaration, ¶ 15.

[123] Intel EB Program Overview.

Background

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In 2009 Intel awarded "investment grants," which were

[124] Intel EB Program Overview.

[125] Intel ECBP Overview.

[126] Intel ECBP Overview.

[127] McKell Declaration, ¶¶ 10 and 12 and "Salary Ranges, Merit Matrices, Promo Guidelines and Budget, Pre-Focal 2008," Linda Lutter, Intel, June 26, 2007, (Exhibit B to the McKell Declaration), 76582DOC000783_000016 in 76582DOC000783 – 76582DOC000783_000020.

[128] "FSM Pre-Focal Analysis 2007," Intel, January 5, 2007 ("FSM Pre-Focal Analysis 2007"), 76583DOC002007_000019 and Dr. Leamer's Intel compensation data.

[129] FSM Pre-Focal Analysis 2007, 76583DOC002007_000019.

[130]

Background

incremental to regular equity award grants in an effort to retain its employees.[131] Intel started the Option Exchange program in 2009 to allow employees the opportunity to exchange "underwater" stock options for a smaller amount of new stock options.[132]

5. Intuit

a. Compensation Overview

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60. ██
     ██
     ██
     ██

b. Compensation Components

61. ██
     ██

62. ██
     ██

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[131] Intel 2010 Proxy Statement, p. 23.

[132] Intel 2010 Proxy Statement, pp. 23 – 4. ("Following approval by Intel's stockholders, in the third quarter of 2009 Intel commenced an employee stock option exchange program (Option Exchange) in which most Intel employees in eligible countries, but not the listed officers or directors, were given the opportunity to exchange "underwater" stock options … The Option Exchange was designed to give added incentive to motivate and retain talented employees and reinvigorate a culture based on employee stock ownership.")

[133] Declaration of Chris Galy, Director of Talent Acquisition at Intuit, November 9, 2012, ¶ 3 and Intuit's website found at http://about.intuit.com/about_intuit/press_room/fast_facts/, accessed on November 20, 2013.

[134] Declaration of Mason Stubblefield, Vice President of Human Resources, Head of Total Rewards at Intuit, November 9, 2012 ("Stubblefield Declaration"), ¶ 6 and "Annual Compensation Decisions, 2007: Communications Session for Executives," Intuit, May 7, 2007 ("Annual Compensation Decisions, 2007"), (Exhibit A to the Stubblefield Declaration), INTUIT_038812, slide 13.

Background

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64. ███

65. ███

66. ███

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[135] Stubblefield Declaration, ¶¶ 21 – 2.

[136] Stubblefield Declaration, ¶ 20.

[137] Stubblefield Declaration, ¶ 10.

[138] Stubblefield Declaration, ¶ 14.

[139] "FY12 Compensation Training," Intuit, April 2012 ("FY12 Compensation Training"), INTUIT_038565, slide 38.

[140] Stubblefield Declaration, ¶ 17.

[141] Stubblefield Declaration, ¶ 17.

[142] FY12 Compensation Training, slide 13.

[143] FY12 Compensation Training, slide 38.

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY   Background

67.   ███

6. Lucasfilm

a. Compensation Overview

68.   The total number of TCR employees employed by Lucasfilm increased more than 6-fold between 2001 and 2011, as shown by **Exhibit III.41**.

69.   The growth in Lucasfilm's TCR workforce is mirrored by a growth in its total expenditure on TCR employee compensation, as shown by **Exhibit III.42**. **Exhibit III.43** shows that average compensation per TCR employee also tended to increase over the period of study. During the relevant period, the average compensation of TCR employees increased by almost 75 percent. Between 2005 and 2007, the average compensation per TCR employee decreased slightly concurrent with a general change in Lucasfilm's compensation practices discussed further below.

b. Compensation Components

70.   Lucasfilm's total TCR employee compensation is composed of base salary and an annual bonus.[148] Lucasfilm is a privately held company and thus does not offer equity awards.[149]

71.   Lucasfilm benchmarks against external compensation survey data, including Radford, Croner Animation and Visual Effects, and Croner Software Games, to set compensation at the market median for cash compensation.[150] Lucasfilm is

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[144] Under the 1993 and 2002 Equity Incentive Plans, Intuit granted equity in the form of stock options, restricted stock awards, and stock bonuses. (See Intuit Inc., Form 10-K for the period ending July 31, 2002, p. 83.)

[145] Under the 2005 Equity Incentive Plan, Intuit granted equity in the form of stock options, restricted stock awards, stock bonuses, and restricted stock units. (See Intuit Inc., Form 10-K for the period ending July 31, 2005, p. 90.)

[146] See **Exhibits III.35 – III.40.**

[147] Intuit 2002 Annual Report, p. 25.

[148] Declaration of Michelle Maupin, Senior Manager, Compensation at Lucasfilm, November 12, 2012 ("Maupin Declaration"), ¶ 8.

[149] Maupin Declaration, ¶ 8.

[150] Maupin Declaration, ¶¶ 10 and 13.

Background

separated into five distinct divisions, each with its own set of peer companies to which it benchmarks salary.[151] Prior to 2006, every position at Lucasfilm had its own pay range.[152] In 2006 and 2007, Lucasfilm reviewed its compensation practices and implemented an overarching system of salary ranges to be used across the firm.[153] Since this development, ███████████████████████████ ██ █████████████████████████ ███ ████████ for certain job titles in an effort to retain key employees due to heavy recruiting from Electronic Arts, Inc.[154]

72.   Base salary increases are determined by employee performance, the overall financial performance of the company, and business unit budget.[155] Increases are effective in April.[156] **Exhibit III.44** shows the average base salary per TCR employee between 2001 and 2011, which generally increased throughout the period.

73.   Bonus payouts are determined by employee performance level, employee performance relative to others, and the performance of their business unit.[157] Bonus payouts occur annually in April, although employees are not guaranteed to receive a bonus every year.[158] **Exhibit III.45** shows the average cash bonus per TCR employee between 2001 and 2011.

7. Pixar

a. Compensation Overview

74.   Between 2001 and 2011, Pixar's TCR workforce doubled in size as shown by **Exhibit III.46.** In 2006, Pixar was acquired by The Walt Disney Company ("TWDC").[159]

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[151] Maupin Declaration, ¶¶ 5 and 11.

[152] Maupin Declaration, ¶ 16.

[153] Maupin Declaration, ¶ 18.

[154] Maupin Declaration, ¶¶ 22 – 23.

[155] Maupin Declaration, ¶ 30 and "Pay for Performance Toolkit," Lucasfilm, January 29, 2011 ("Pay for Performance Toolkit"), LUCAS00188924 in LUCAS00188922 – 9.

[156] Maupin Declaration, ¶ 30 and Pay for Performance Toolkit, LUCAS00188925.

[157] Pay for Performance Toolkit, LUCAS00188924.

[158] Maupin Declaration, ¶ 8 and Pay for Performance Toolkit, LUCAS00188925.

[159] Declaration of Lori McAdams, Vice President of Human Resources and Administration at Pixar, November 12, 2012 ("McAdams Declaration"), ¶ 6.

Background

75.   Between 2001 and 2011, Pixar's total compensation to its TCR employees grew along with the number of TCR employees, as seen in **Exhibit III.47**. Pixar's average compensation per TCR Class member shows more volatility. As shown by **Exhibit III.48**, average compensation generally increases between 2001 and 2012 with notable decreases in 2004 and 2008 through 2009.

b.   Compensation Components

76.   Pixar's total TCR employee compensation is composed of: base salary, a film bonus, and the long-term incentive program ("LTI"), which was equity-based until 2009 when it was converted to be cash-based.[160] Prior to this change, Pixar offered equity in both stock options and RSUs.[161]

77.   Pixar uses the Radford survey and the Croner Animation and Visual Effects survey to benchmark base salary.[162] ███████████████████████████████████████ ██ ███████████████████████████████ Base salary increases are determined based on employee performance as well as performance relative to other employees.[164] Increases are announced in late February or early March but are effective retroactively to January 1.[165] As shown by **Exhibit III.49**, average base salary per TCR employee shows a slight increase over time throughout the relevant period.

78.   Pixar awards a film bonus to its TCR employees based on a film's profitability, and the payout amount is set as a percentage of the employee's salary.[166] Payments occur approximately four weeks after a film's DVD release, which is typically around five months after the film's theatrical release.[167] In May 2003, Pixar released *Finding Nemo*, one of the highest grossing animated feature films of all time, and thus, employees received a large film bonus in 2003.[168] The next Pixar film was not released until November 2004; therefore, employees did not receive a

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[160] McAdams Declaration, ¶ 6.

[161] Deposition of Stephanie Sheehy, Manager of Human Resources Analysis at Pixar, March 5, 2013 ("Sheehy Deposition"), pp. 48 and 113.

[162] McAdams Declaration, ¶¶ 12 – 14.

[163] McAdams Declaration, ¶ 10.

[164] "2010 Salary Increase & LTI 'Talking Points,'" PIX00009091 in PIX00009089 – 92.

[165] McAdams Declaration, ¶ 21.

[166] McAdams Declaration, ¶ 18. As of 2012, all of Pixar's films have been profitable. (Deposition of Lori McAdams, Vice President of Human Resources and Administration at Pixar, ("McAdams Deposition"), August 2, 2012, p. 23.)

[167] McAdams Declaration, ¶ 18.

[168] Pixar, Form 10-K for the period ending January 3, 2004, p. 2.

Background

film bonus in 2004.[169] Since 2006, films have been released during the summer of each year, and thus, film bonuses have been awarded at the end of every calendar year.[170]

79.   Beginning in 2009, Pixar TCR employees received another form of cash compensation. A few years after its acquisition by TWDC, the LTI program was converted into a cash-based program from an equity-based program.[171] ███████████

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Exhibit III.50 shows the average cash bonus to TCR employees at Pixar. **Exhibit III.51** shows Pixar's average cash compensation per TCR employee by year.

80.   Between April 2004 and December 2008 before the change to the LTI program, Pixar awarded equity annually.[175] ████████████████████████

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████████ **Exhibit III.52** shows the average value of equity awards by type to Pixar TCR employees while **Exhibit III.53** shows the average value of equity of all types.

8.   **There Is No Pattern in Compensation Changes Across Defendants When The Class Period Is Compared to The Rest of the Period**

81.   The charts described above show that there is no apparent pattern of reductions in employee compensation concurrent with Class period. **Exhibit III.54** summarizes average TCR employee compensation by year and Defendant. **Exhibit III.55**

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[169] Pixar, Form 10-K for the period ending January 1, 2005, p. 4.

[170] McAdams Declaration, ¶ 18.

[171] McAdams Declaration, ¶ 17. ████████████████████████████████

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[172] "Long Term Incentive Plan FAQ," PIX0009070 in PIX0009070 – 4.

[173] "A New Long-term Incentive Compensation Plan," January 21-22, 2009 ("A New LTI Compensation Plan"), Pixar, PIX00009057, slide 3.

[174] **Exhibit III.51** includes the film bonus, and from 2009 through 2011, cash grants from LTI are also included.

[175] McAdams Declaration, ¶ 16.

[176] Email exchange "Fwd: 2007 Salary increase & stock grant planning" between Ed Catmull at Pixar and Rowghani Ali at Pixar, December 14, 2006, PIX00009180 and Dr. Leamer's Pixar compensation data.

[177] A New LTI Compensation Plan, slide 2.

Background

shows the percentage changes in the average employee compensation in each year of the relevant period.[178]   As can be seen from the exhibit, there is no pattern of large negative changes in compensation at the start of the alleged Class period across all Defendants.   Defendants' data also show different patterns with respect to the recession at the end of the Class period, from steady growth at Intel, to flat growth at Adobe, to █████████████████████████ and Google.

82.   **Exhibits III.54** and **III.55** also illustrate the high degree of variation in outcomes across the seven Defendant companies. For example, as shown in **Exhibit III.55**, the average change in compensation from 2003 to 2004, the last year prior to the Class period, ranged from -20.5 percent for Pixar to ██████████████. For 2010 to 2011, the first year after the Class period, the range is from -1.7 percent for Google to ██████████████. The changes in average TCR employee compensation outside the Class period do not appear to have any pattern that is different from inside the Class period. Dr. Leamer's theory suggests compensation was suppressed during the Class period; however, the Defendants' compensation data do not support this theory. For example, five of the seven Defendants had ██ (Adobe, Apple, Google, Lucasfilm and Pixar). As shown by **Exhibit III.55**, over the period from 2002 to 2011, Adobe, Apple, Lucasfilm, and Pixar all had the ████████████████████████████████ ████████████████████████, and Intel and Intuit had years that were within 0.2 percent of the highest increases. While, Google's best year was 2003, a ██████ percent increase, the increases for Google Class members for 2007 and 2009 were higher than any other Defendant's increases in any year, inside or outside the Class period.

83.   In his October 2012 Report, Dr. Leamer presented a "preliminary informal impact assessment" that concluded that "under-compensation cumulates to 12.9 percent in 2009."[179] In this informal impact assessment Dr. Leamer averaged the average percent change in total compensation in 2004 and 2011 and used that as a benchmark for what a reasonable compensation growth allegedly should have been during the period 2005 to 2007.[180] Dr. Leamer used this assessment to motivate his conduct regression and to corroborate its purported findings of undercompensation by all Defendants during the Class period. However, by aggregating all of Defendants' compensation changes into one number that reflects the average across Defendants in any given year Dr. Leamer's informal impact assessment hides the

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[178] **Exhibit III.55** is a disaggregation of Dr. Leamer's Figure 19 from his October 2012 report. We have changed his calculation of the year to year change in compensation. Dr. Leamer calculates the percent change by taking the difference in the log of total compensation. This is not typically how percent changes are calculated. I have used the more traditional approach of taking the difference in compensation and dividing by the first year's compensation. **Appendix Exhibit III.1** shows the percent changes using Dr. Leamer's methodology.

[179] Leamer October 2012 Report, pp. 63 – 64 and 140.

[180] As I discuss later, he acknowledges that the recession makes this benchmark inappropriate for 2008 and 2009.

wide variation in compensation changes across Defendants discussed above. Because of this wide variation in the underlying data, the assessment he performed in his 2012 report actually provides no motivation for the damages method he uses in his current report and produces an unreliable benchmark against which to "validate" his regression results. Viewed company by company, a preliminary assessment like the one performed by Dr. Leamer does not support a conclusion that damages are Class-wide, consistent across any company, or that they should average 10 percent of compensation for all companies across the Class period.

IV.   Dr. Leamer's Theory of Compensation Suppression Does Not Support Plaintiffs' Claim of Class-wide Damages

A. Plaintiffs Theory of Widespread Harm from the DNCC Agreements Is Implausible

84. Dr. Leamer proposes a theory in which small decreases in cold calling caused large suppression of wages across the more than 60,000 diverse members of the Class. His theory of impact and damages rests on three key assumptions. First, Dr. Leamer posits that the DNCC agreements restrained material information about the market value of Class members' labor. He asserts that cold calling "reveals the nature of outside opportunities both to workers and to employers," and that the DNCC agreements "suppress compensation by limiting this flow of information about attractive outside opportunities."[181] Dr. Leamer acknowledged in deposition that he had not studied whether his assumptions are correct, and he has made no attempt to measure them.[182]

85. Second, Dr. Leamer claims that in the absence of the agreements, recipients would have used the information obtained from cold calls from Defendant firms to bid up compensation at their current employer or leave for new jobs at other firms. For

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[181] Leamer October 2012 Report, ¶ 68. See also Leamer December 2012 Reply Report ¶ 12. ("Cold-calling is a distinct and special channel of information that accesses job candidates who otherwise would be left unaware of attractive opportunities.")

[182] Without data on cold-calling, Dr. Leamer acknowledges that he cannot directly measure the information associated with cold calls and how much actual information was suppressed. Leamer Deposition Vol. I., p. 80. ("Q. How much information was suppressed between Apple and Adobe? A. Well, that would require a data set that I don't have-- I don't have the information on all the cold calling that was made and all the cold calling that was not made as a consequence of the agreement. And secondly, to translate that into some measure of information is going to be very difficult. … And I haven't had a database that would allow me to do it.") Leamer Deposition Vol. I., pp. 101 – 2. ("Q. … how long would the process take in order to have some kind of impact? A. …early on I was imagining that we would have career paths of each individual and information about who was cold called when, and you can build up a … econometric model that would underline the sequence of questions that you'd ask. But because we don't have that information, we have to do with what we have.") Leamer Deposition Vol. III., p. 921 – 2. ("Q. Have you studied that with regard to the defendants, how information was shared among the defendants' employees? A. Well, I've taken it as a given that there would be some significant information sharing among employees. … Q. But you have no evidence of the rate or amount of information sharing among any employee force at any of the defendants, do you? A. I don't have direct evidence.")

example, Dr. Leamer writes, "when employees discover information regarding their labor's value by receiving an offer from a competing employer, those employees use that information to negotiate higher salaries at their current employer."[183] Dr. Leamer further assumes that "those individuals tell others at their employer, who then resent the perceived unfair jump in pay, increasing pressure to match compensation increases broadly."[184]

86.   Finally, Dr. Leamer argues that the impact of individual compensation increases or employee departures would have propagated through Defendants' alleged somewhat rigid wage structures as employers preemptively increased wages across all job categories within the Class. He assumes that "when management becomes aware of an attractive outside opportunity for one individual this may make management aware also of the implicit competitive threat to similar individuals and management may feel it wise to make a preemptive move against that threat by an increase in compensation for these newly-threatened similar employees."[185]

87.   Plaintiffs' theory of harm does not support the measure of Class-wide damages that Dr. Leamer claims. The amount of information allegedly restricted through DNCC agreements was only one of potentially many sources of "price discovery" information available to employees from both Defendants and non-Defendants. Because employees continued to have access to information about outside opportunities and their market worth from many other sources, preemptive raises or anticipatory increases in compensation would still have occurred during the Class period. If one accepts Plaintiffs' assumption that internal equity concerns drive compensation decisions these compensation increases would have been propagated throughout the Class.

88.   At most, restrictions on cold-calling may have had the effect of reducing information to specific employees about specific opportunities at specific firms. The impact to an individual who might have received such calls, if any, would depend on the nature of the foregone opportunity and the potential increase in compensation afforded by the opportunity. But there is no basis to believe that those restrictions would have caused impact to all or substantially all Class members.

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[183] Leamer October 2012 Report, ¶ 113.

[184] Leamer October 2012 Report, ¶ 114 (internal quotations omitted.) He characterizes this as "water-cooler talk." (Leamer October 2012 Report, ¶ 75.) Plaintiffs have not identified an actual instance of this chain of events occurring, and none of the five named Plaintiffs experienced this alleged chain of events.

[185] Leamer May 2013 Supplemental Report, ¶ 15.

B. Restrictions on Cold Calling Among Defendant Firms Would Not Have Led to Widespread Compensation Changes

89. There are a number of significant flaws in Dr. Leamer's chain of reasoning regarding the method by which a reduction in cold calling can suppress wages on a Class-wide basis. In the first instance, there is no basis for Dr. Leamer to assume that cold calling reveals positive information about outside opportunities. Nor is there any basis for Dr. Leamer's assumption that the information available to a firm's employees would be materially diminished by a reduction of cold calling from one, two, or three firms that together make up a tiny fraction of potential hiring demand for those employees.

90. Many cold calls may not reveal any information to a prospective target. Employees may not respond to cold calls or follow up on unsolicited emails. Some of the named Plaintiffs testified that they frequently blocked or ignored unsolicited calls or emails from recruiters.[186] If the recipient is a "passive" candidate, no material information may have been transmitted to the call recipient since, as Dr. Leamer points out, these employees are "content and not actively looking for opportunities elsewhere."[187]

91. Even if some interest is shown by the candidate in following up with the recruiter, the end result of that interaction need not result in the employee learning positive information about job opportunities. It may be that the opportunity available offers a lower compensation package than the employee is currently earning. For example, average compensation at Google was among the highest of all the Defendants during the Class period. **Exhibit III.54** shows the average compensation per TCR employee at all Defendants in all years. Google had the highest average TCR employee compensation in every year of the Class period except 2008, when ███. In several of the alleged damage years, Google's average compensation was more than double the average compensation of some of its alleged rival employers. In 2005, for example, ███████████████████████████████ ███████████████████████████████ Intel and Intuit, which were the only firms with which Google had a DNCC agreement. It is simply implausible that

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[186] Deposition of Siddharth Hariharan, former software engineer at Lucasfilm, Volume I, October 12, 2012, p. 44. ("I just know that I received many [cold calls] and continue to receive many from people that I've told not to....") See also Deposition of Daniel Stover, a former software engineer at Intuit, Volume I, October 29, 2012, pp. 201 – 2. ("Q. With respect to the phone calls, did you make any efforts to screen the calls so you didn't have to pick it up and—A. No desire at all to talk to him. … It doesn't really show a lot of effort in terms of myself, it's just kind of a random screening.") In the Deposition of Mark Fichtner, he discusses the difference between "serious cold calls" and "spam cold calls." (Deposition of Mark Fichtner, a former software engineer at Intel, Volume I, October 15, 2012, pp. 88 – 90.)

[187] Leamer October 2012 Report, ¶ 62 and "Intro to External Sourcing, Target Audience: Intel Sourcers, Q1 2009," Intel, 2009, 76550DOC000024 in 76650DOC000014 – 95.

Google would have been at risk of losing sufficient numbers of its employees to firms with which it has a DNCC agreement or that it would have had to raise compensation to all of its TCR employees to prevent attrition to firms with substantially lower wage structures.

92.　Finally, even if an employee would have received a cold call, obtained information about a better job opportunity at one of the DNCC Defendants, and received an offer, that would not necessarily cause any effect on compensation at the employee's current firm. The current firm may decide not to make a counteroffer, in which case the employee remains at his or her current compensation level or leaves for the new opportunity. The current employer would elect to make a counteroffer only if the value of the employee that was a recipient of the call exceeded the required compensation to keep the employee.

93.　Moreover, Google did not have DNCC agreements with Adobe, Lucasfilm or Pixar. There is no reason why the DNCC agreements entered into between these other firms would have affected compensation to Google's TCR employees. To the contrary, if recruiters at other firms are restricted from calling some Defendants, but not Google, then one might reasonably expect that cold calls from those firms to Google Class members, to the extent there were any at all, would go up during the Class period.[188] Therefore, not only would Google's own DNCC agreements not reasonably have saved Google from having to raise its compensation structure even further above that of its alleged rivals, the DNCC agreements between other firms could have caused an increase in cold calls to Google that could potentially offset any alleged reduction in calls from Apple, Intuit, and Intel. This is also true for the other Defendants. No Defendant had DNCC agreements with more than three other Defendants. Therefore, each Defendant could have experienced an increase in cold calls from the Defendants with which it did not have any agreement.

94.　Plaintiffs have made no showing and it is implausible to assume that absent the DNCC agreements, any Defendant would have faced such aggressive cold calling that it would have been compelled to make reactive or preemptive increases in its compensation for all or substantially all its employees. Dr. Leamer has not established that the compensation structures of any of the firms in his damage study

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[188] Dr. Leamer acknowledged that there is a "presumption" that Defendants would increase cold calling to Defendants with which they do not have an agreement. Leamer Deposition Vol. III., p. 1085. ("Q. So do you have any opinion at all as to whether Apple's inability to place cold-calls to Adobe employees would increase the likelihood that it would call Intel employees? A. Well, this comes back to the substitution possibility, and the presumption would be that there would be some substitution. Q. The presumption would be that if Apple can't call Adobe employees, it's more likely to call Intel employees; correct? A. Correct.")

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were below market. As stated above Adobe, Apple, and Google targeted their salary structures to be above market levels.[189]

C. Employees Do Not Depend on Cold Calling From DNCC Defendants to Learn About Their Market Worth

95.   Plaintiffs' overarching theory of harm is that cold-calling contributes to the flow of information about outside opportunities available to employees and the employees' market worth. Under Plaintiffs' theory, when employees have ready-access to information about their market worth, firms must pay employees their market wage or risk losing them to another firm that is willing to offer that employee higher compensation or an otherwise better opportunity. According to this theory, the greater the flow of information to employees, the more closely aligned compensation must be to market wages. Thus, according to Plaintiffs' theory, restricting cold-calling has the potential to restrict information flow and allow firms to undercompensate employees with less fear of losing them to an outside opportunity.

96.   Dr. Leamer alleges but does not establish through factual evidence that cold calling from the DNCC agreement firms was an important source of information about the market worth of Defendants' TCR employees.[190] Dr. Leamer offers no evidence that cold calling from Defendant firms during the relevant period would have provided information not otherwise available in the market. There are many other available sources of information about jobs and wages. Defendants' TCR employees can discover information about market wages and opportunities from new hires joining a Defendant firm from the market, cold-calling from non-Defendant firms, cold calling from Defendant firms that did not enter into DNCC agreements with the employee's firm, and even hires from the DNCC agreement firms that continued in the Class period notwithstanding the agreements. In addition, Defendants' TCR employees can discover information from job postings, salary surveys, job fairs, websites such as monster.com that post compensation information, and information from acquaintances at other firms.[191]

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[189] See Background Sections for Adobe, Apple, and Google (III.A.1.b, III.A.2.b, and III.A.3.b.) Adobe began targeting above the market for its base salary in 2008, ▮▮▮▮▮▮▮▮▮▮▮ and Google was at or above market prior to 2007, and then further increased its target in 2007.   Intel was targeting below market average at the beginning of the Class period and then raised its target to above average in 2006. (See section III.A.4.b and McKell Declaration, ¶ 15.)

[190] Dr. Leamer acknowledges that there is no way to measure exactly how much cold calling was used to recruit and how many people benefited from information from cold calling in non-Class periods. Furthermore, he does not provide reliable evidence that the ripple effect would have been widespread throughout the Class. (See Section IV.E.2 for additional discussion regarding Dr. Leamer's ripple effect analyses.)

[191] For examples, see Murphy January 2013 Report, ¶¶ 21 and 39 and Deposition of Donna Morris, Senior Vice President of Global Human Resources at Adobe, August 21, 2012 ("D. Morris Deposition"), pp. 90 – 1. ("Q: And its one of the ways in which information about available jobs is transmitted to employees? Is that right? Cold calling is. A:…I would say earlier in

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97.   As Dr. Leamer acknowledged in deposition, the own-hiring that a firm does provides a potentially significant source of information for the Defendants' incumbent employees.[192] Having gone through the job market to reach their employer, a new hire would have relevant information about the current value of a job, and other potential opportunities. The "water cooler talk" that Dr. Leamer describes as the method for transmitting cold call information could just as easily be applied to recent hires talking to their new colleagues.[193] Between 2005 and 2009, Defendant firms hired 20,054 new TCR employees.[194] While Dr. Leamer states that new employees' starting salaries would also be affected by the DNCC agreements, he has no evidence or analysis to support that opinion. Dr. Leamer's own regression analysis only uses compensation information for TCR employees who have been at a Defendant firm for at least two years. Therefore new employees are entirely omitted from his compensation analysis.

98.   In fact, some of these new hires from non-Defendant firms could have been recruited by other Defendant firms in addition to the firm they joined. Prior to the new hire joining a Defendant firm, there is no restriction on the recruiting methods other Defendants could use to attract that employee. **Exhibit IV.1** shows that Defendants hire new employees from a wide variety of sources.[195] Google drew new employees from over 8,500 sources. Only Lucasfilm and Pixar drew new employees from fewer than 2,000 sources. Nonetheless, there are some firms from which all Defendant firms tend to recruit. So, for example, a person working for Microsoft may be simultaneously recruited by Apple, Adobe, Lucasfilm, and Google. If the employee eventually chose to join, say Apple, the wage that Apple offered that employee must have been sufficient to compete with Adobe, Lucasfilm, and Google, regardless of any DNCC agreements between those firms. And, if firms have the somewhat rigid compensation structure that Dr. Leamer claims they have, then the competitive wage that Apple would have had to pay the Microsoft employee, would have a ripple effect through Apple, notwithstanding the DNCC agreements.

99.   Even if cold calling represents some unique form of information that is different from the information newly hired employees bring in from the outside, the potential information flow from cold calling did not cease during the Class period. The

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a person's career they would likely find out more about job opportunities through their friends, job postings, different websites, sites like Glassdoor, et cetera.")

[192] Leamer Deposition Vol. I, p. 79. (Q: "And there was information flow and price discovery resulting from all of those hires and losses, correct?" A: "That's correct.")

[193] Leamer October 2012 Report, ¶ 75.

[194] See **Exhibit IV.3**.

[195] **Exhibit IV.1** is derived from recruiting data from each Defendant. I am not able to identify whether the employee was in the Class for any of the Defendants except Adobe and Apple.

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DNCC agreements would not have affected cold-calling from the hundreds of other employers looking to hire Defendants' employees. As Dr. Leamer acknowledged in deposition, the majority of the firms with which the Defendants compete for recruits are non-Defendant firms.[196]

100.   Furthermore, the DNCC agreements did not prevent the Defendants from cold calling employees from other Defendants during the Class period.[197] As described above and acknowledged by Dr. Leamer, if a DNCC agreement prevented a Defendant from cold calling one of the other Defendants, the firm could substitute by cold calling the other Defendants' employees more than it would have without the agreement.[198] The table below shows that during the Class period, the DNCC agreements challenged by Plaintiffs represented only six of the 21 possible pairs of Defendants.

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[196] Leamer Deposition Vol. I., p. 79. ("Q: So let me ask you to look at the data you do have that you cited in your own report. And, once again, the number of talent acquired and talent lost, the vast majority comes from nondefendants, correct?...A: The majority definitely does.") Leamer Deposition Vol. III., p. 903. ("Q. Are you aware of the evidence in this case that shows that for each defendant, 99 percent of the employees that were hired before, during, and after the conduct period came from sources other than the defendants? A. Well, I know the number is very large…I would stipulate that indeed that is the case."). See also "DRAFT: Executive Search," Jeff Vijungo, Senior Director, Talent Acquisition, at Adobe Systems, Inc., 2008, ADOBE_005966 in ADOBE_005950 – 67.

[197] Dr. Leamer acknowledged at deposition that there were no restrictions on cold-calling among many of the Defendants. Leamer Deposition Vol. III., p. 894. ("Q. And in fact, there is no restriction on cold-calling among many of the defendants with each other; correct? A. That's correct.")

[198] Dr. Leamer acknowledged that there is a "presumption" that Defendants would increase cold calling to Defendants with which they do not have an agreement. Leamer Deposition Vol. III., p. 1085. ("Q. So do you have any opinion at all as to whether Apple's inability to place cold-calls to Adobe employees would increase the likelihood that it would call Intel employees? A. Well, this comes back to the substitution possibility, and the presumption would be that there would be some substitution. Q. The presumption would be that if Adobe can't call Intel employees, it's more likely to call Intel employees; correct? A. Correct.")

Table 1

DNCC Agreements Between Defendants

	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar
Adobe		Yes	No	No	No	No	No
Apple	Yes		Yes	No	No	No	Yes
Google	No	Yes		Yes	Yes	No	No
Intel	No	No	Yes		No	No	No
Intuit	No	No	Yes	No		No	No
Lucasfilm	No	No	No	No	No		Yes
Pixar	No	Yes	No	No	No	Yes	

Source: Plaintiffs' Supplemental Answers and Objections to Defendants' Second Set of
Interrogatories, May 24, 2013.

101.   Moreover, notwithstanding the restriction on cold calling, the DNCC agreements
did not prevent recruiting and hiring between Defendants who were parties to those
agreements. Defendants recruit using a variety of tools and sources so a restriction
on cold calling during the Class period would have likely resulted in substitution to
another recruitment method.[199] **Exhibit IV.2** shows hiring from DNCC agreement
partners, while small even prior to the DNCC period, did not decrease during the
Class period relative to the pre-Class period and was only 0.2 percentage points
lower than in the post-Class period. The continued hiring by Defendants of
employees from firms with which they had DNCC agreements shows that recruiters
found alternative ways of reaching TCR employees or employees continued to find
ways to become informed about opportunities at DNCC firms.

102.   Because TCR employee transfers did not meaningfully drop between the firms with
DNCC agreements, there is no basis to assume that the flow of information about
positive opportunities at these firms was meaningfully suppressed. Moreover,
because actual cross-hiring did not decrease, the do-not-hire without approval
conditions Dr. Leamer points to do not appear to have had any impact on hiring.[200]

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[199] Leamer Deposition Vol. III., p. 903. ("Q. …So you would agree with me that recruiters, whether they're employed by the
defendant or they're outside contractors, have incentives to find other means to successfully recruit candidates if they can't
do cold-calling? A. That's correct.")

[200] Leamer October 2012 Report, ¶¶ 44 and 49 and **Exhibit IV.2**.

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D. Evidence Points to Little Loss of Information, If Any, Due to the Agreements at Issue

103. The amount of information that might reasonably have been restricted by DNCC agreements is small relative to the potential other sources of information described above. Transfers between firms with DNCC agreements represented only 0.2 percent of new hires even before the Class period. See **Exhibit IV.2**. In contrast, hiring from sources with which there is no DNCC agreement makes up the remaining 99.8 percent of hiring. Dr. Leamer overlooks these meaningful alternative sources of information that could have (1) informed Defendants' TCR employees when there were better opportunities with other firms or that their compensation was too low and (2) informed Defendants that compensation increases were necessary for their incumbent employees, if in fact either of these things is true.

104. **Exhibit IV.2** also shows that in terms of both the counts and percentages, the amount of hiring from Defendant firms, while small even before the alleged Class period, did not decrease during the Class period.[201] These figures suggest that the overall amount of recruiting between Defendant firms did not decrease despite the agreements not to cold call between certain pairs of Defendants.

105. **Exhibit IV.3** shows that between 2001 and 2011, the Defendants hired a substantial number of TCR employees in every year.[202] During the alleged Class period in particular, new employees represented 8.6 percent of the Defendant firms' total TCR employees.[203] Relative to the pre-Class period, the level of hiring from 2005 to 2008 increased at almost all of the Defendants. In particular, Apple and Google increased their number of TCR employees during the Class period, and so their hiring was higher than in the pre-Class period.[204] After a jump in hiring in 2005, Intel carried out a reduction in force, yet it still had a greater number of new hires than most of the other Defendants during the Class period.[205] Because overall hiring of TCR employees did not decrease at the Defendant firms and new hires are

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[201] For this analysis, new hires are counted only when they are first hired by any of the Defendants. Rehires are not included.

[202] New hires are employees hired from the labor market and do not include employees that joined when their firm was acquired by a Defendant firm. The latter have compensation determined at their prior employer and, therefore, could inform the Defendants' employees of what a competitor pays its employees. But Dr. Leamer does not include employees that joined through an acquisition in his count of new hires so for consistency I have left them out of mine. Unlike **Exhibit IV.2**, for the analysis in **Exhibit IV.3** I include rehires in the count of total new hires.

[203] This figure is based on Dr. Leamer's regression and employee data, using his n_new_hire and the sum of the n_emp_yr variables to calculate the percentage of new employees at all Defendant firms as a portion of the total number of employees at the Defendant firms between 2005 and 2009.

[204] See also, **Exhibits III.9** and **III.17** above. Note that these charts include both new hires and acquisitions.

[205] As described above, Intel began a reduction in force in 2006, laying off 10,500 employees and implementing a hiring freeze, as a result of a company restructuring effort.

a substantial share of each firm's employee base, information about market compensation levels would still flow to TCR employees during the Class period. Thus, there is no basis to assume that the amount of information available to the Class was lessened in the Class period.

106.   **Exhibit IV.4** shows the percent of each Defendant's TCR employees that were new hires during the pre-Class, Class, and post-Class periods. The percent of new hires during the Class period was higher for all of the Defendants relative to at least one non-Class period. This is further evidence that the amount of information the Defendants' incumbent TCR employees received about their worth was not lower during the Class period.

107.   **Exhibit IV.5** shows this information from the perspective of the Defendant who lost employees to a DNCC agreement partner. **Exhibit IV.5** shows the number and percent of each Defendants' TCR employees who were recruited to a firm with which it had a DNCC agreement. For example, in the pre-Class period, Adobe lost 11 employees to Apple (the only Defendant firm with which it had a DNCC agreement), but it lost 26 employees to Apple during the Class period. While the 11 employees lost in the pre-Class period represented 0.15 percent of Adobe's TCR employees, the 26 employees lost to Apple during the Class period were 0.26 percent of Adobe employees.

108.   The analysis in **Exhibit IV.5** shows that the number of employees lost to DNCC agreement firms in the pre-Class period was very small. No Defendant lost more than 0.2 percent of its TCR employees to a DNCC firm. With the exception of Intuit, during the Class period, hiring of Defendants' TCR employees by firms with DNCC agreements did not decrease relative to the pre-Class period. This suggests that the DNCC agreements did not stop Class members from finding out about opportunities at other Defendant companies. This further undermines Plaintiffs' claim that the DNCC agreements caused employees to lose information about job opportunities and their market worth. More TCR employees left during the Class period than in the pre-Class period. Thus, information about opportunities was still reaching Defendants' TCR employees notwithstanding the DNCC agreements.

E.   Dr. Leamer's Theory that Employers Failed to Make Preemptive Increases in Compensation to Employees Because of the Conduct at Issue is Implausible

1.   Defendants Continued to Increase Compensation in the Class Period Based on Other Sources of Market Information

109.   When Dr. Leamer alleges that the suppression of the flow of information on market worth by Defendants' DNCC agreements resulted in a suppression of compensation increases to the entire Class, he overlooks the fact that the material information that he claims was less available to Class members was still collected and utilized by the Defendants to increase compensation to the Class. Dr. Leamer's suggestion that

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there would have been still more increases is speculative and implausible. Evidence produced in this case demonstrates that the Defendants responded to information on competitive wages from a variety of sources and maintained compensation structures that were competitive in a broader market.

110.   As described in the background section, throughout the period of study (including in the alleged Class period) the Defendants used market compensation surveys as a benchmark for their compensation structure. These surveys compile relevant compensation information from the employers each Defendant considered its peers.[206] Each merit cycle, when compensation increases were determined, Defendants used a comparison of their compensation to the market data as part of the decision making process on how much to increase compensation. Thus, the compensation levels of rival employers (most of whom were not Defendants) were already being factored into the Defendant's pay structure. Information from individual TCR employees that would hypothetically have been cold called would not likely provide material new information beyond that which was already collected in the surveys.

111.   In addition, arms-length negotiations with potential new hires gave employers information about whether their compensation was competitive enough to attract the new employees they needed. ██████████████████████████████████████ ██ ████████████████████████████████████ .

112.   The ███████████ program is an example of how Google targeted compensation increases to particular employees without, in turn increasing compensation for other

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[206] The peer companies for each Defendant included some of the other Defendant firms, but the vast majority of peers were not Defendant firms. Many of the Defendants benchmarked against the same peer companies. In 2009, Apple identified 21 peer companies, including Cisco Systems, Inc., Hewlett-Packard Company, International Business Machines, Microsoft Corporation, and Oracle Corporation, and only 2 are Defendants. (Burmeister Declaration, ¶ 4.) ████████████████ ██ ██ In 2008, Lucasfilm used the Croner Software Games Survey to benchmark against 37 peer companies including Microsoft Corporation, Disney Interactive Media Group, Disney Interactive Studios, Sony Computer Entertainment America, Inc., and Warner Bros. Interactive Entertainment. ("Croner Software Games Survey Results," The Croner Company, 2008, (Exhibit A to the Maupin Declaration), LUCAS00018799 – 800 in LUCAS00018779 – 807.)

[207] Wagner Declaration, ¶ 9. ██████████████████████████ ██ ██ See also Google Rewarding Talent: Compensation, slide 11.

employees.[208] As I will discuss in more detail below, Google ███████████
███
███████████████████ Yet this increase to a select group of employees did not
cause a ripple throughout Google's TCR employees. Furthermore, Dr. Leamer has
no basis to argue that more people would have been selected for the ████████
program, since that was determined by Google's business needs, or that these
individuals would have received more equity than Google gave them.[210]   Finally, I
also understand that Google's adoption of Big Bang followed unrelenting recruiting
from Facebook and, to a lesser extent, other start-up firms. This activity continued
for years and resulted in a significant number of Google employees transferring to
other non-Defendant companies.[211] Plaintiffs point to no evidence that additional
cold calls from Defendants would have triggered such a broad based response by
any other Defendant.

2.   **Dr. Leamer's Analyses of the Purported Ripple Effect Do Not Demonstrate that Compensation Moves Together Within and Across Defendants' Job Titles**

113.   Dr. Leamer argues that the alleged diminution of cold calls hurts all employees in
the Class because of the "somewhat rigid" pay structure of the Defendants.[212] Dr.
Leamer argues that the "water-cooler talk" would have led to broad, reactive or
preemptive compensation increases that "ripple" through the entire Class. My
analyses demonstrate that Dr. Leamer is wrong to conclude that there is a
"somewhat rigid" salary structure that leads to widespread undercompensation in
the Class period.

114.   Dr. Leamer relies on several statistical analyses to support his conclusion that the
compensation suppression allegedly caused by the DNCC agreements would be
broadly felt. In the Leamer October 2012 Report, Dr. Leamer performs what he
calls a "Common Factor Analysis" and concludes that he can explain about 90
percent of the variation in compensation by looking at each employee's firm, title

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[208] As Dr. Leamer acknowledged in deposition, reactive and preemptive wage increases can also occur because the Defendants are facing competition from Defendants with which they do not have an agreement as well as non-Defendant firms. Leamer Deposition Vol. III., p. 906. ("Q. And isn't it true that reactive and preemptive wage increases can occur because Adobe is facing competition for its employees from both non-defendants and defendants other than Apple? A. That's correct.")

[209] Letter from Laszlo Bock of Google to Art and Paul, ("Letter from Laszlo Bock") GOOG-HIGH-TECH-00519081 in GOOG-HIGH-TECH-00519081 – 91.

[210] Letter from Laszlo Bock, GOOG-HIGH-TECH-00519081. (█████████████████████████████████
██
████████████████████████████████████
")

[211] Wagner Declaration, ¶ 33. Letter from Laszlo Bock, GOOG-HIGH-TECH-00519081.

[212] Leamer October 2012 Report, ¶ 120.

and a few individual characteristics: age, tenure, location, and gender. This, he says, is evidence of the somewhat rigid salary structure: if employees at the same firm, of similar ages, and job titles earn similar wages, the firms must have somewhat rigid salary structures. In the Leamer May 2013 Supplemental Report, Dr. Leamer extends his analysis to examine pay structure as it relates to job titles within each company.

115.   Dr. Leamer's job title pay structure analysis is comprised of two parts. He first analyzes the correlations of total compensation for each job title and reports the correlations between average job title compensation and total Class compensation at each firm.[213] In Figures 2 and 3 of his report, he records how often the correlation coefficients are positive, and in Figures 4 and 5 of his report he notes the percentage that are statistically significant, which can be as low as 54 percent when looking at correlations of changes in compensation and as low as 45 percent when looking at correlations of levels of compensation.[214]

116.   Dr. Leamer then performs regression analyses of the average job title compensation to determine whether the positive correlations come from a sharing effect, meaning they are moving together because they are related, or if they are being driven by an outside force that is moving both series, even though the series are not otherwise related. He further attempts to determine whether a firm takes "corrective action" when two job titles begin to move apart.[215] In this analysis Dr. Leamer purports to test the effect of internal equity on the average total compensation within each job title.[216]

117.   He opines that this pay structure analysis corroborates his previous analysis and is further evidence of the rigidity of the compensation systems across the Defendant firms.

   a. **Dr. Leamer's Conclusions from his Individual Level Data Analysis are Flawed and Do Not Support a Somewhat Rigid Wage Structure That Would Propagate Compensation Increases**

118.   In his "Common Factors Analysis," Dr. Leamer purports to show that a small number of common factors explain the vast majority of the variation in

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[213] Leamer May 2013 Supplemental Report, ¶¶ 30 – 33 and Tables 1 and 2.

[214] Leamer May 2013 Supplemental Report, ¶¶ 30 – 33 and Figures 2 – 5.

[215] Leamer May 2013 Supplemental Report, ¶ 26.

[216] Leamer May 2013 Supplemental Report, ¶ 29.

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compensation and, thus, there is a somewhat rigid salary structure.[217] But that is not, in fact, what the data show.

119.   While it is true that his regressions show that the common factors account for most of the variation in an employee's total compensation, the amount of variation explained is not always as high as he implies. For example, the variation explained by his common factors is as low as 52 percent for Pixar in 2003 and 62 percent for Google in 2005.[218] In addition, Dr. Leamer overstates the importance of some of the "common factors." The common factors included in Dr. Leamer's common factors regression are the firm, location, job title, age, tenure and gender.[219] However, employer and job title explain almost all of the variation that Dr. Leamer claims to have explained in his regression analysis. As shown in **Exhibit IV.6**, running the same regressions with only the employer and job title indicator variables explains virtually the same amount of variation in compensation as Dr. Leamer's regressions.[220] Further, excluding job title and employer and only accounting for individual factors, less than 20 percent of the variation in compensation is typically explained. This means that the "common factor" that allegedly explains wage rigidity is job title, however, as shown below, even if employers pay similar salaries for a similar job title, that does not mean that employees are treated similarly over time. Employees can be promoted to different job titles and earn salary increases commensurate with their promotion. This routine and expected event in an employee's career is completely unaccounted for in Dr. Leamer's analysis.

120.   In addition, while his common factor regressions may suggest that at any given point in time an employee's employer, job title, location, age, tenure, and gender may produce a reasonably accurate estimate of that person's compensation, those factors do not imply that employees are treated in a somewhat rigid manner over time, a key assumption underlying Dr. Leamer's propagation theory. Without showing that the rigidity leads to employees being treated similarly over time, Dr. Leamer is wrong to conclude that internal equity concerns will lead to broad based preemptive compensation adjustments. Dr. Leamer attempts to establish that internal equity concerns cause firms to treat employees similarly over time in the Leamer December 2012 Reply report by demonstrating that the vast majority of employees receive a base salary increase every year. While employees do generally receive raises every year, the data do not support the broader conclusion that the raises given to employees are granted in a somewhat rigid manner over time.

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[217] Dr. Leamer uses the regression R^2 to measures the amount of variation explained by his "common factors."

[218] Leamer October 2012 Report, Figure 14.

[219] Leamer October 2012 Report, Figures 13 and 14.

[220] In each year the R^2 for the model with only title and firm is within 1 percentage point of the R^2 using all of Dr. Leamer's common factors.

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121.   While similar individuals may start at similar base salary levels, over a period of
        five years, growth levels are very different such that the base salary of those
        individuals may be quite different by the end of the five-year period. **Exhibits
        IV.7-IV.10** provide examples illustrating the base salary outcomes of cohorts of
        individuals who started at Defendant firms at roughly the same time.[221] For
        example, ███
        ██
        ██████████████████████████████████.█████████████████████████████
        ██
        See **Exhibit IV.7**. This example shows that even when employees start at similar
        compensation levels, the raises that they earn, which reflect individual performance,
        can result in very different salary outcomes over five years.

122.   A similar result is observed when analyzing 34 male Google Class members aged
        23-24 with less than two years of experience and the title Software Engineer III.
        These employees had a range of base salaries from ████████████████ in 2007 (a
        starting range of 31.9 percent). By the end of 2011, the range had grown to
        ███████████████ (a range of ███ percent).[223] See **Exhibit IV.8**. The salaries
        at the top of this range are almost double the salaries at the bottom of the range.
        This observed variation in salaries within a job title for employees with similar ages
        suggests that Google is not confined to a rigid salary structure, and instead can
        reward employees based on individual characteristics such as performance. It is
        also worth noting that in this example, even when the employees were all in the
        same title at the very beginning of their tenure, the range of salaries was large.
        Analyses of Intel and Adobe employee cohorts (**Exhibits IV.9** and **10**) demonstrate
        variation among base salaries that is also indicative of a lack of a rigid pay structure
        or common movement in base compensation over time.[224]

123.   As shown in **Exhibits IV.11-14**, extending this analysis to look at total
        compensation only makes the variation greater.[225] Hence, the common factor
        analysis presented by Dr. Leamer does not suggest a rigid pay structure over time.
        Examining individual employees' compensation over time demonstrates the

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[221] A similar analysis was conducted by Dr. Murphy in his November 2012 report.

[222] The range percentage is measured by the difference in the highest to lowest salary as a proportion of the minimum of the range.

[223] The employee compensation changes within this cohort of employees because of differences in annual raises and in the timing and number of promotions over the five years.

[224] The analyses in these illustrative exhibits track changes in base salary over time. While base salary is just one of the compensation components earned by the Class, bonus and equity awards demonstrate even greater variability across cohorts of Class members (See below for a discussion of variation in equity payments across Class members.)

[225] Total compensation for the Apple cohort shows a ██. The Google, Intel, and Adobe cohorts start with total compensation spreads of ████ percent, ███████████, and 57.9 percent, respectively, in 2007, and increase to ████ percent, ███████████, and 82.1 percent in 2011.

absence of any structure that would cause compensation increases to ripple through a firm's TCR employees because of additional cold calls from one, two, or three potential employers.

124.   Looking at the actual variation in compensation changes within and across job titles further demonstrates that Dr. Leamer's conclusions are wrong. **Exhibit IV.15** shows the wide range of changes in compensation for the employees in each job title.[226] Moreover, there is also wide dispersion in the changes in pay across job title for all Defendants. **Exhibit IV.16** shows the percent deviations from the average change in compensation by job title.[227] The range of compensation changes between those with the largest average pay increases, the top decile, and those with the smallest average pay increases, the bottom decile, can be as large as 59 percent. These differences can be caused either by movement across job titles changing the mix of employees being averaged together or by disparate compensation changes within the job title. Both of these reasons are inconsistent with Dr. Leamer's contention that the allegedly rigid compensation structure and internal equity concerns will lead to widespread salary suppression caused by a significant ripple effect on the small number of individuals who may have not received a cold call because of the DNCC agreements.

b. **Dr. Leamer's Conclusions from His Analysis of Job-Level Pay Structure and Correlations Are Also Faulty**

125.   In the Leamer May 2013 Supplemental Report, Dr. Leamer extended his common factors analysis to look at movements over time across job title. As described above, he runs correlation analyses and regression analysis on average title compensation and asserts that these models support his opinion of a somewhat rigid compensation structure. Dr. Leamer concludes that because the average total compensation between most job titles is positively correlated there is a somewhat rigid compensation structure. This conclusion is without merit. I will discuss two primary problems with his analyses.[228]

126.   First, even if a firm had a somewhat tight compensation structure within and across job titles – and the data here show wide variations within and across job titles –

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[226] This analysis includes only employees who were in the same job title the previous year, so that I do not artificially increase the variation due to employees moving between job titles.

[227] This analysis is similar to the analysis shown in Exhibit 6 to the Murphy June 2013 Supplemental Report. The changes hold constant employee age, tenure and gender.

[228] There is a third issue that I mention above: averaging the compensation for each job title and comparing across years creates variation because the mix of employees in each title changes every year. In his third deposition, Dr. Leamer agreed that the change in mix negatively affects his averages. See Leamer Deposition, Vol. III, p. 1077. ("A. Yeah, I'm totally in synch with this idea that changing composition of the workforce raises havoc with the title averages, and I've made that clear in this report, too. So if that's where we're going, I agree.")

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individuals move between job titles. The ability of a firm to respond to outside information by moving an employee from one title to another makes Dr. Leamer's analysis irrelevant. Second, correlation analyses simply show the extent to which two series move together, they do not show that one causes the other or that the co-movement even leads to similar end points. As I will demonstrate below, the level of correlation that Dr. Leamer finds does not support his opinion that the co-movement is particularly rigid. Therefore, the additional analysis performed by Dr. Leamer in the Leamer May Supplemental Report do not support the conclusion that a somewhat rigid compensation structure necessarily leads to preemptive compensation changes across a wide group of employees.

127.   Dr. Leamer overstates the importance of his correlation analysis. Correlations range from -1 to 1. With a perfectly rigid wage structure, we would expect a correlation close to 1, signaling that an employee's wages always move in the same direction. But even a correlation close to 1 may not be evidence of rigid structure, because correlations say nothing about magnitudes. For example, assume two titles both have starting salaries in 2005 of $50,000. If over the next five years Job Title 1 has an annual increase of $1,000 and Job Title 2 has an annual increase of $10,000, the correlation coefficient for these two titles is exactly 1. However, the employees in Job Title 2, despite starting at the same level, are making on average $45,000 (or 90 percent of the starting salary) more than Job Title 1 at the end of the 5-year period. If Job Title 2 had annual increases of $100,000 the correlation would still be exactly 1, but the employees with Job Title 2 would now have 10 times the salary at the end of period.

128.   This is not simply a theoretical critique. While Dr. Leamer reported at his deposition that his correlation analysis showed an "astound[ing]" level of co-movement, Dr. Murphy determined that average correlation between job titles was about 0.6.[229] Dr. Leamer appears to be mistaken about the amount of co-movement that can be explained by a correlation of 0.6. **Exhibit IV.17** shows the movement of total compensation for two Apple employees in the Class with a correlation of 0.65, slightly higher than Dr. Leamer's average.[230] However, one observing their total compensation over time would probably not conclude that they move together, much less that the amount of co-movement was "astounding." While one employee experiences a steady increase in compensation over the nine year period, the second employee experiences a slight overall decrease in compensation before receiving a

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[229] Supplemental Expert Report of Kevin M. Murphy, June 21, 2013 ("Murphy June 2013 Supplemental Report"), ¶ 27 and Deposition of Edward E. Leamer, Vol. II, June 11, 2013 ("Leamer Deposition, Vol. II"), pp.560 – 3. ("A:…[M]y conclusion is I was astounded by the level of correlation that actually occurred in the context of the fact that there's all this – all this textual information to support this idea that there's somewhat rigid salary structure. So within that context the – you're way beyond the bar where there's evidence in the correlation structure of a somewhat rigid salary structure.")

[230] These are demonstrations of a correlation for individual employees, but the same would be true for average compensation for job titles.

large reward in 2009 and 2010, which is then followed by another decrease in compensation in 2011. **Exhibits IV.18-IV.20** show similar patterns among employees at Adobe, Google, and Intel. In each case, despite having correlations of 0.6 the total compensations of the pairs of employees do not seem to move together in a rigid structure.

129.   Second, regardless of how much one can conclude about the rigidity of compensation for the job titles from a correlation of 0.6 or Dr. Leamer's regression analyses, a simple example demonstrates why Dr. Leamer's pay structure analyses offer no insight to the question of internal equity. Assume a firm has three job titles in the Class: Software Engineer 1, Software Engineer 2 and Engineering Manager. Further, assume that within each of those job titles there are three distinct pay amounts. Therefore, in this company, there would be nine distinct compensation levels each year. Assume, further, that over the course of a 5-year period, within each job title the average pay increased by 5 percent every year. Finally, assume the number of employees at each pay level within a job title is the same every year. Based on this discussion it would be reasonable to conclude this firm had a rigid salary structure. In fact, in this example the correlation coefficient for each of the job title pair would be 1.0.

130.   However, even within this rigid structure there would be plenty of room to move an employee who is a high performer and respond to offers from the outside, without disrupting the rigid structure whatsoever. For example, employees can be moved within the job title to a different pay level and equally importantly employees can be moved across job titles. At the end of a five year time period, the level of pay, and thus the changes in pay within those years, could be very different for any two employees. And, if one employee is more valued than the other, the company may not feel compelled to shift the second employee in response to outside information given to the first employee. This hypothetical example is consistent with the pattern of compensation shown in **Exhibits IV.7-14**.

131.   For example, **Exhibits IV.21-24**, show the job titles each year for each of the same cohorts of employees in **Exhibits IV.7-14**. Over the five year period the cohorts at Adobe, Apple, Google and Intel ended up in five different titles and at Intel the cohort ended up in four different titles. In addition, over the five years one of the Google employees was never promoted, while others changed title three times. At Apple three of the 16 employees and at Adobe four of the eight employees were in titles that no one else in the cohort was in by 2009.

132.   Finally, **Exhibit IV.15** shows every job title for the employees included in Dr. Leamer's Merits compensation regression that have at least 25 employees in at least one year.[231] This exhibit demonstrates that across each of the Defendants there are

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[231] Because there were very few job titles for Lucasfilm with at least 25 employees I lowered the threshold to 15 employees.

meaningful year to year differences in the number of employees included in each job title in Dr. Leamer's regression.[232]   The importance of this is two-fold. First, it demonstrates that there is enough movement within a firm that individual employees move in and out of job titles (or in and out of firms), which is consistent with the **Exhibits IV.21-24** above and corroborates my criticism of Dr. Leamer's common factors analysis. Second, it demonstrates that there will be meaningful changes in the mix of employees within each job title, which affects the average total compensation and renders meaningless Dr. Leamer's correlations and pay structure regressions.

c. **Dr. Leamer's Common Factor Analysis Does Not Support the Conclusion that Equity Has a Somewhat Rigid Structure.**

133.   While Dr. Leamer has stated that equity could be a tool used by firms to retain employees, the data do not support an opinion that equity payments are used to maintain internal equity or that changes in equity payments propagate through a firm.[233]   As shown in **Exhibit IV.25**, the variation explained by Dr. Leamer's common factors when looking only at equity is below 50 percent in all but two years, and as low as 29 percent in 2008.

134.   **Exhibits IV.26-IV.29** show the equity earned by the same cohort of employees as shown in **Exhibits IV.7-IV.10**. The Apple cohort (**Exhibit IV.26**) has ▮▮▮.

135.   Similar variation is observed in equity payments to Google employees. See **Exhibit IV.27**. For example, in 2010 Employee 27 earned ▮▮▮▮▮▮ in equity, which is more than any of the other employees earned over the entire 5-years. This shows that equity can be used selectively to reward high performers. Seven of the 34 Google employees earned smaller equity awards in 2011 (outside the alleged Class period) than they earned in 2007 (inside the alleged Class period), while one employee earned more than ▮▮▮▮▮ more in 2011 than 2007.

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[232] Even when the number of the employees is the same from one year to the next there could be important movement that affects the average compensation for that job title. For example, if a title had 25 employees in 2002, 17 of which were at the high end of the salary range and 14 of those 17 were promoted in 2003 and replaced by 14 new or newly promoted employees at the low end of the salary range, then the number of employees would be the same in the two years, but it is likely average salary would fall.

[233] Leamer October 2012 Report, ¶ 97. ("Equity distributions are especially important for retaining critical employees during expansions when many firms are actively recruiting talent.")

136.   ███████████████████████████████████

█████████████████████████████████ See **Exhibit IV.28**.
Exhibit IV.29 shows that of the eight Adobe employees, only one received equity
payments in every year (Employee 6) and four received equity only in the first year
(Employees 4, 5, 7 and 8), including the three employees who earned the highest
awards in 2007 (Employees 5, 7 and 8).

137.   Finally, **Exhibit IV.30** shows that the percentage of employees who receive equity
varies each year and by Defendant.   The percentage of employees receiving equity
varies significantly across Defendants, with some at zero, others around 50 percent,
████████████████████████████████

The fact that substantial numbers of employees do not even earn equity further
establishes that equity payments are not a means by which compensation
suppression would be expected to propagate through the firm.[234]

d. **Google's** ████████████████ **Demonstrates that Compensation
Changes Can Be Directed to Specific Employees Without Affecting
Compensation of Other Employees**

138.   In 2007, due to increased competition for talent from Facebook and start-up
companies, Google implemented a program in which ████████████████
████████████████████████████████
██████████████   This program is an example of the lack of rigidity in
equity compensation and also deviates from Dr. Leamer's theory that compensation
increases to some employees will propagate to cause compensation increases for
others through considerations of internal equity.   Instead, this program is an
example of a Defendant being responsive to perceived direct market competition,
but the response, while possibly large, can be directed to a small number of

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[234] When I apply Dr. Leamer's model only to base salary there are no damages in aggregate, suggesting equity is an important
driver of his damages. See **Exhibits IV.31** and **IV.32**. Given that his evidence does not support an alleged ripple could
occur in equity due to the Defendants' pay structure, Dr. Leamer does not have an empirical foundation for why his damages
would be concentrated in equity.

[235] November 29, 2007 – █████████████████████, GOOG-HIGH-TECH-00519070.R – 1.R. The memo discusses
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█████████████████████████████ The data show that
there is not a "ripple" effect to other employees from these large grants. Dr. Leamer has presented nothing to suggest that
had three additional companies been able to cold call Google employees this program would have needed to compensate
these targeted employees at even higher levels or that the number of employees targeted would have needed to be expanded.
Arguably, this suggests that there should be no damages for Google, and at a minimum suggests that there should be no
damages to employees who actually received such large compensation increases.

employees, without a concern of internal equity creating a ripple to the rest of the
work force.

139.   The program was the result of consistent losses to Facebook of both potential
recruits and existing employees. Several start-up firms also targeted senior Google
employees with offers of "████████."[236] Google was concerned that the ████████
████████████████████████████[237] According to Dr. Leamer's internal equity theory, rewarding a
few employees with a large compensation increase should have resulted in these
increases "rippling" throughout all TCR employees. Hence, if Dr. Leamer were
correct in his theory of a somewhat rigid compensation structure, we should see
relatively large total compensation increases to all or substantially all Class
members in 2007 or 2008. However, while the memo describing the ████████

140.   I have identified the employees who likely received ████████████████ and
compared those employees to the rest of Google's Class members.   As is
demonstrated in **Exhibit IV.33**, there is no perceptible ripple to the remaining Class
members. In every job level, it is evident that the grant recipients received a very
large spike in total compensation in 2007, while the rest of the employees in the
Class received compensation at their typical levels. In addition, the same exhibits
show no increase out of the norm in 2008, so there is also no evidence of delayed
ripple.

141.   Dr. Leamer concludes from the Google "Big Bang" in 2011 that "even a small
number of moves can generate broad and far-reaching changes in compensation."[240]
My analysis of the 2007 Google grant increase does conclude that increased
competition for talent can lead to changes, but they need not be broad or far-
reaching.

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[236] November 29, 2007 – ████████████ Email Exchange, GOOG-HIGH-TECH-00519070.R.

[237] November 29, 2007 – ████████████ Email Exchange, GOOG-HIGH-TECH-00519070.R.

[238] As described below, there is also no evident increase in cash compensation to the remaining TCR employees.

[239] Based on the date of the Google ████████ Email Exchange, the stock price identified in the e-mail and the size of the
grants reported in the compensation data, I am able to identify a ████████████████████
████████████. When I then match that list against the Class members in the backup to Dr. Leamer's regression analysis
for the Leamer October 2013 Merits report, I find ████████████████████████████

[240] Leamer December 2012 Reply Report, ¶ 53.

Dr. Leamer's Theory of Compensation Suppression Does Not Support Plaintiffs'
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142.   This example from Google is consistent with my opinion above that the data show that Dr. Leamer is wrong to conclude there is a somewhat rigid compensation that necessarily leads to broad-based compensation losses when even a small amount of "price discovery" is lost. Without that conclusion, there is no reason to believe that the DNCC agreements would lead to widespread and large damages because of small incremental decreases in information, relative to the other sources of information in the marketplace that I describe above.

F.   Dr. Leamer's Theory that the Defendants Failed to Distribute Revenues to their Employees During the Conduct Period is Contrary to Available Evidence

143.   In his Class report, Dr. Leamer suggests that as the Defendants' profits grow, the increase in profits will "likely [ ] be spent partly on raising wages and retaining key employees."[241] He also suggests, but does not provide evidence, that the DNCC agreements were put into place as firm revenues "began to grow substantially" and were used to reduce the pressure to distribute some of those gains to their employees.[242]

144.   Dr. Leamer provides only one chart to illustrate his point about the growth of revenue per employee and average total compensation to employees over the period, suggesting that the non-compete agreements were enacted as Apple profits began to rise.[243] Dr. Leamer's own chart, however, suggests that growth in average employee compensation in the conduct period actually outpaced growth in average revenue per employee, unlike Dr. Leamer's assertion. Dr. Leamer's Figure 9 shows that, although revenue per employee growth was relatively flat or negative through the conduct period, average total compensation per employee was growing faster during the conduct period than in the pre-conduct period, and faster than the growth in revenue per employee.

145.   To examine this point, I have prepared **Exhibits IV.34 – 40,** which show the relationship between revenue per employee and average total compensation per employee for each of the Defendants over the relevant period. These exhibits show the ratio of average total compensation per Class member at a given Defendant to revenue per employee.[244] For many of the Defendants, the percentage of the revenue per employee being paid as average total compensation to employees grew

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[241] Leamer October 2012 Report, ¶ 99.

[242] Leamer October 2012 Report, ¶ 100.

[243] Leamer October 2012 Report, ¶ 99 and Figure 9.

[244] If an employee who was paid the average total compensation at a Defendant and who earned the average revenue per employee for a Defendant in a given year was paid 50% of those revenues as their salary, we would expect that percentage to be reflected in these charts.

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over the conduct period, suggesting that these Defendants were actually distributing a higher percentage of their revenues to employees on average. For Apple in particular, the growth in the share of revenue per employee accounted for in employee compensation during the Class period followed a decline in the percentage of revenues being shared with employees as compensation prior to the Class period. Moreover, the ratio of average employee compensation to revenue per employee dropped following the Class period, suggesting "profit sharing" was actually at its greatest during the time period the alleged agreements were in effect. Growth in the average total compensation to employees as a percentage of the revenue per employee during the Class period is also seen at Adobe, Intel and Lucasfilm.

V.   Dr. Leamer's Damage Model Is Misspecified and Inaccurate

A.   Overview of Dr. Leamer's Damages Methodology

146.   Dr. Leamer purports to estimate the alleged undercompensation to Class members due to the alleged conspiracy using a regression model that attempts to determine the amount by which each Plaintiff's total compensation was reduced during the years in which DNCC agreements were in effect, after controlling for certain characteristics of the firm and individual.[245] Dr. Leamer's model estimates compensation as a function of variables that are specific to the employee (age, tenure, gender, location, and recent compensation history), the firm (firm hiring rate, and revenue per employee) and additional control variables that take on the same value for all employees at all firms for a particular year (an annual time trend, employment in the industry, the total number of new hires for all seven Defendants, and the total number of transfers among all Defendants).[246]

147.   Only certain variables in Dr. Leamer's compensation regression are specific to the particular employee. These include the employee's age and its squared value, the employee's tenure and its squared value, an indicator variable for whether the employee is male, and a set of indicator variables for the state where the employee works. Also specific to the given employee are that employee's total compensation from the previous two years; Dr. Leamer allows the effect of the previous two years' compensation to have differential effects at different firms (e.g., last year's compensation may have a different effect on this year's compensation for employees at Google compared to employees at Apple). The inclusion of the

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[245] Total compensation includes an employee's base salary, cash bonus and an estimated value of equity grants. The total compensation variable in Dr. Leamer's regression is adjusted for changes in the CPI such that he is measuring the impact on real compensation rather than nominal compensation. Nominal compensation is the employee's earnings in dollar terms and is what the firm will set or negotiate with the employee. Real compensation reflects the buying power of the employee's compensation and differs from nominal compensation depending on the overall inflation rate of the economy.

[246] See Leamer October 2012 Report, ¶¶ 142 – 7, for a fuller description of the variables included in his analysis.

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previous two years' compensation also affects the composition of the subset of employees on which his regression is estimated – only years in which the employee has been at the firm for three years or more are able to be included in the estimation of the model.[247] See **Exhibit V.1**. All of the other variables in Dr. Leamer's regression are the same across all employees for a given firm in a given year.

148. One additional factor omitted from Dr. Leamer's compensation regression that he included in his "common factors analysis" is a set of fixed effects for job title. While the model chosen by Dr. Leamer does not allow for the inclusion of fixed effects for the job titles at every company, job title, and promotions from one job title to another, may nonetheless give information about an employee's abilities, talents or job prospects that is not otherwise controlled for in the model.   An employee who has distinguished himself from his colleagues may be rewarded with a promotion and a salary increase. Without the ability to control for the change in title that accompanied the promotion, Dr. Leamer's model will assume that the salary increase should have propagated to other workers of the same age and tenure, when instead the employee in question was deliberately being set apart from his peers. Dr. Leamer's model cannot distinguish deliberate and intentional salary differentials from actual harm, if any, arising from the DNCC agreements.

149. Job title and promotion history are not the only variables omitted from Dr. Leamer's model. Other important control variables, such as controls for the end-of-Class-period recession and firm-specific compensation events, are also omitted from Dr. Leamer's model. These and other limitations of Dr. Leamer's model are discussed in Section VII below.

150. After controlling for certain, but not all, factors that affect compensation, Dr. Leamer attempts to measure the effect of the alleged anticompetitive behavior by evaluating whether compensation changed during the years in which a DNCC agreement between Defendants was allegedly in effect. The centerpiece of Dr. Leamer's measurement of damages is his "conduct" variable, which operates similarly to an indicator variable. He sets the variable to be 1 in years in which the Defendant had one or more of the DNCC agreements in place for the full year and 0 in years in which a DNCC was not in place. In years in which the agreements at issue were not in effect for the full year, Dr. Leamer sets the "conduct" variable to be equal to the assumed proportion of the year over which an agreement was in place. Thus, because the agreements for all seven Defendants ended in March of 2009, the "conduct" variable takes the value 0.25 for all seven Defendants in that

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[247] Due to the nature of lagged variables, all observations from years 2001 and 2002 are dropped, regardless of how long an employee has been at the Defendant's firm.

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year.[248] It takes the value 0.5 for Adobe, Apple, Google, and Intel in 2005 and for Intuit in 2007, when Dr. Leamer assumes those firms entered into their DNCC agreements.[249]

151.   Dr. Leamer also interacts the Class period variable with the age and square of age of the employee, and the hiring rate of the employee's firm.[250] He thus allows for the possibility that the firms' alleged behavior had differential effects on employees of different ages, or at firms that had been doing different amounts of hiring relative to their total number of employees. However, he has not opined on the reasons why he would expect the DNCC agreements to affect individuals differently at different ages and at different firms, but not, for example, during different years or for different job titles.[251]

152.   For ease of discussion, the results of Dr. Leamer's compensation regression are replicated in **Exhibit V.2** to this report. Dr. Leamer concludes that, all else equal, these results indicate that there was undercompensation during the Class period and undercompensation was greatest for young employees and old employees but lessened for middle-age employees. The model also appears to suggest that undercompensation was greater for firms that were expanding (hiring greater numbers of new employees).[252] Based on the coefficients on the "conduct" variables, Dr. Leamer's model finds that all employees in the Class were undercompensated at all seven Defendants in each year from 2005 to 2009. The aggregate alleged undercompensation to the Class according to Dr. Leamer's model is about $3.1 billion, or roughly 10 percent of total compensation to the Class.[253]

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[248] While Dr. Leamer calls his fixed effect variable that purports to measure the effect of the alleged conspiracy "conduct", it is essentially a dummy variable as discussed above. I refer to it as the "Class period variable" in the text, but display it as "conduct" similar to Dr. Leamer on the Exhibits to my Report that display regression results.

[249] Pixar and Lucasfilm entered into a DNCC agreement with each other prior to 2001, therefore the Class period variable takes on the value 1 for those companies in all years prior to 2009.

[250] "Interacting" a variable with another variable simply means including the product of the two variables in the regression.

[251] Leamer Deposition Vol. III., p. 935. ("Q. You have also theorized that younger employees and employees with shorter tenure are less likely to be cold-called; correct? A. By the word "younger," I would say the youngest are probably not the target of cold-calling. Somebody who has just graduated from college and been hired in the first month, that seems to me unlikely to be the target of cold-calling. But at some time later - - it's not the oldest, but at some time later, you're going to become a target for cold-calling.") And, Leamer Deposition Vol. III., p. 1071. ("Q. You would eliminate the disaggregated conduct variables and do - - and insert the four that you chose? A. Or - - or find some other variable. I made a concerted effort to find variables that would help me understand why these firms were different. I know they're not identical, but they're not perfectly distinct, either.")

[252] While the coefficient on the hiring rate interaction is negative, the hiring rate itself is the logarithm of a value between 0 and 1, and hence negative. As a result, the net impact of the interacted hiring rate variable on compensation is positive. As hiring rate increases this effect approaches 0, and therefore overall alleged undercompensation (measured by all four of Dr. Leamer's conduct variables) increases.

[253] Dr. Leamer presents three alternative regression methodologies in Exhibits 4 – 6 of his October 2013 Merits Report. All three of these alternative specifications estimate alleged damages greater than or equal to $3.1 billion. As noted in his Merits Report, Dr. Leamer does not see any improvement from these models over his "updated original" model presented in

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Exhibit V.3 shows Dr. Leamer's alleged damages by Defendant and year.[254] Intel has the largest alleged damages at over $1.4 billion, followed by Google (approximately $774 million) and Apple (approximately $508 million). Due to Dr. Leamer's alleged persistence effects, alleged damages tend to grow larger year-on-year over the Class period.

153. While Intel has a very large total damages number, it is not the case that its alleged undercompensation percentage is greater than that of the other firms. Looking at the alleged undercompensation as a percentage of total actual compensation (see **Exhibit V.9**), Lucasfilm and Pixar actually have the greatest percent undercompensation according to the results of Dr. Leamer's model. Intel tends to have one of the lowest undercompensation percentages among the seven Defendants in any particular year.

154. There are numerous flaws in Dr. Leamer's damage model. The model suffers from specification errors and is improperly specified to test the theory of harm alleged. The model yields counter-intuitive and implausible results that are inconsistent with Plaintiffs' theory of harm or well-established relationships in labor economics. The model is not robust to minor changes in specification: "damages" are greatly diminished or eliminated entirely when minor changes are made to the specification. More finely tuned tests for the impact of the DNCC agreements at issue show that there is no Class-wide impact on compensation from these agreements. Below, I describe each of these errors in more detail and discuss the impact they have on Dr. Leamer's damages estimates and conclusions regarding impact.

B.   The Specification of Dr. Leamer's Model Is Inconsistent with his Theory of Harm

155. The specification of the damage model chosen by Dr. Leamer is not consistent with his theory of harm. Dr. Leamer's theory of harm is that a reduction in information available to employees allowed firms to undercompensate Class members without fear of losing those employees to competitors with better opportunities. However, as shown above, there is no *a priori* reason to believe that the amount of information available to employees was meaningfully reduced during the Class period, and Dr. Leamer acknowledges that the agreements between pairs of Defendants could have led to increased cold calling to other Defendant firms.[255] Dr.

Exhibits 2 and 3. (Leamer October 2013 Merits Report, ¶¶ 41 – 3.) I therefore focus the critiques of this report on that model.

[254] See **Exhibits V.4 – V.8** which display damages for each of the Named Plaintiffs.

[255] Dr. Leamer acknowledged that there is a "presumption" that Defendants would increase cold calling to Defendants with which they do not have an agreement. Leamer Deposition Vol. III., p. 1085. ("Q. So do you have any opinion at all as to whether Apple's inability to place cold-calls to Adobe employees would increase the likelihood that it would call Intel employees? A. Well, this comes back to the substitution possibility, and the presumption would be that there would be some substitution.

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Leamer's model does not allow one to evaluate whether the measured undercompensation in the Class period is caused by a reduction in cold-calling from the Defendant firms rather than other factors not included in the model. The Class period variable that Dr. Leamer uses to measure damages is not tied to a reduction in cold-calling, but rather to a time period in which the agreements at issue existed regardless of whether they were effective at reducing the alleged flow of information to a firm's employees. As discussed below in Section VII, any economic events that occurred in the Class period and not outside the Class period are being picked up by Dr. Leamer's Class period variables that turn on from 2005 to 2009 and off outside of this period.

156.   Nothing in Dr. Leamer's damage model measures information available to employees, frequency of cold calling, or suppression of information. Dr. Leamer acknowledges that cold-calling, recruiting and employee movement continued throughout the Class period, but asserts without support that the amount of price discovery information available to employees was reduced. [256] Dr. Leamer does not allow for a differential impact when there is allegedly greater suppression of cold calls (*e.g.*, entering into a DNCC agreement with a larger firm doing a significant amount of hiring or entering into more than one DNCC agreement) as opposed to less suppression of cold calling (e.g., entering into a DNCC agreement with a small firm doing relatively little hiring or entering into a single DNCC agreement). Dr. Leamer therefore makes no attempt to link damages to the amount of information allegedly suppressed, or the magnitude of potentially lost job opportunities for the Class.

157.   A proper test of the theory would evaluate whether the magnitude of allegedly reduced information affects compensation as opposed to the mere fact of an agreement. That is, a firm that is trying to hire 1,000 employees, but who cannot call Apple's employees directly should reasonably have a larger impact on information flow than a firm that is attempting to hire 10 employees but cannot call Apple's employees directly.

158.   The reasoning is straightforward and suggested by Plaintiffs' own theory of harm. Own-firm hiring is expected to raise compensation at the firm doing the hiring: Dr. Leamer's model shows a positive coefficient on his hiring rate for individual

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Q. The presumption would be that if Apple can't call Adobe employees, it's more likely to call Intel employees; correct? A. Correct.").

[256] Leamer October 2012 Report, ¶ 72 and Leamer October 2013 Merits Report, ¶ 11. ("The speed at which price discovery operates depends on the manner in which, and how rapidly, information is disseminated among buyers and sellers. Cold-calling is part of the normal information dissemination process, and non-compete agreements that limit the flow of information about opportunities slow down the price discovery process and thus affect each and every labor contract in a way that works adversely for workers and to the benefit of firms engaged in the Non-Compete Agreements.")

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firms.[257] Thus, the firm that is doing a proportionally greater amount of hiring should have higher compensation than a firm doing proportionally less hiring, all else equal. The increased compensation at the firm that is expanding then represents positive outside opportunities relative to a firm that is doing proportionally less hiring. Impact should therefore be greatest if the firm with which a company has a DNCC agreement is expanding relative to the reference firm.

159.   Dr. Leamer's model does not allow this variation to be reflected in his model even though it is consistent with both his theory and the results of his model. The Class period variable is forced to have a constant impact across firms regardless of the market activities and opportunities at the firm (or firms) with which each Defendant entered into a DNCC agreement. Dr. Leamer's Class period model does not even allow for greater impact based on the number of agreements a Defendant has, something Dr. Leamer acknowledges should in theory occur.[258]

160.   Because Dr. Leamer forces the impact of the Class period variable to be constant regardless of the magnitude or importance of information suppressed, Dr. Leamer's damages specification is not consistent with his theory of the way in which the conduct at issue is alleged to cause harm to employees. The "information" available to employees is not part of the model or estimated in any way. His model does not allow one to evaluate whether the alleged impact is related to a reduction in cold calling, a reduction in any information flow, or some other factor. As shown in Section IV above, there is no meaningful indication that information to employees was reduced, and therefore no basis to assume that the effect Dr. Leamer appears to be measuring arises from a reduction in information flow as opposed to other micro and macroeconomic factors that occurred concurrent with the Class period, but are lumped into a common conduct variable that affects all firms equally.[259].

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[257] See Leamer October 2013 Merits Report, Exhibit 2, variable #27.

[258] Leamer Deposition Vol. III., pp. 982 – 3. ("Q. So under your model, it doesn't matter whether it's three agreements, one agreement, or twelve agreements. It's either on or off? A. Correct. Q. But you would agree with me that logically a firm that has an arrangement such that it's not being cold-called by three other firms is inhibiting more information than if it only had an agreement with one of those three firms? … A. That I would agree, but then the question is what impact that has. The equation's about impact, and you know, I accept the premise of this discussion that you could try to distinguish the impact depending on the character of the agreement rather than just the presence. Q. But you didn't do that, did you? A. I explored some of that, but didn't find it something that data would tolerate.")

[259] This point is discussed in more detail in Section VII below.

C.   The Coefficients on Variables in Dr. Leamer's Regression Have Counter-Intuitive Interpretations

161.   A well-known effect of misspecification and omitted variables in regression analyses is that coefficients can be estimated with the "wrong" sign.[260] This seems to be the case with Dr. Leamer's analysis. Dr. Leamer's regression produces unexpected results with respect to the effect of age and other variables on compensation. The results of his regression show a negative coefficient with respect to age, and a positive coefficient with respect to age-squared.[261] This is contrary to the expected signs based on economic literature on wage modeling.[262] The implication of Dr. Leamer's result is that the older a person is, the less they are expected to be paid, all else equal. This effect reverses at age 63, at which point the impact of age on an employee's compensation becomes less negative as age increases. See **Exhibit V.10**.

162.   The counter intuitive signs on Dr. Leamer's age variable only occur on the age variables that have not been interacted with the Class period variable, which is when Dr. Leamer's model purports to measure compensation absent any of the agreements at issue.[263] Within the Class period, the interactions between the age variables and the Class period variable have the expected sign – positive on the interaction between the Class period variable and age, negative on the interaction between the Class period variable and the square of age.[264] The implication for damages based on these variables is that the alleged conduct has the smallest impact on an employee aged 40 or 41, with the effect of the alleged conspiracy getting larger the further an employee gets away from this age. Dr. Leamer's model therefore concludes that very young or old employees have larger

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[260] See Peter Kennedy, *A Guide to Econometrics*, Sixth Edition, (Blackwell Publishing, 2008) ("Kennedy"), pp. 368 – 71. (A wrong sign is an indication that "there is undoubtedly some shortcoming in one's theory, data, specification, or estimation procedure.")

[261] See Leamer October 2013 Merits Report, Exhibit 2, variables #19 and 20.

[262] Dr. Leamer also believes that wages increase with age, until about age 55 when they start to decline. Leamer Deposition Vol. III., p. 935. ("A. How is age related to compensation? I suppose it's true in most industry [sic], but these are firms that have upward sloping compensation as a function of age, and peaking out at probably 55 years old or something like that as a shape of the wage age profile…"). See also Orley Ashenfelter and Richard Layard, eds., Handbook of Labor Economics Volume I, p. 603. ("The major stylized facts which the theory attempts to explain are: a life cycle earnings profile which is increasing at early ages and is declining towards the end of the working period.") See also George Borjas, Labor Economics, Fifth Edition, (McGraw-Hill, 2010), p. 64. ("...[A] great deal of evidence suggests that the typical worker's age-earnings profile-- the worker's wages over the life cycle-- has a predictable path: wages tend to be low when the worker is young; they rise as the worker ages, peaking at about age 50; and the wage rate tends to remain stable or decline slightly after age 50.")

[263] This result is exactly the opposite of the signs on the age and age-squared coefficients that Dr. Leamer obtained in his common factors analysis. See Leamer October 2012 Report, Figure 11.

[264] See Leamer October 2013 Merits Report, Exhibit 2, variables # 1 and 2.

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undercompensation percentages than middle aged employees.[265] See **Exhibit V.11**. I have seen nothing in Dr. Leamer's explanation of his theory to explain this result.[266]

163.   The counter-intuitive signs in Dr. Leamer's model are not limited to the variables related to age. The model also estimates negative coefficients on both the total number of new hires among the seven Defendants, the revenue per employee from the prior year, and the annual time trend.[267] Taken at face value, Dr. Leamer's results imply that, all else equal, as the firms are doing more hiring, they pay their employees less. This runs contrary to basic economic principles and suggests that Dr. Leamer's model suffers from an endogeneity problem, in which case it is unreliable as an estimator of damages.[268] The fact that the signs on the coefficients on revenue per employee and the time trend are also negative is counterintuitive and suggests an underlying problem with the model. As shown above, over the course of the Class period, the Defendants are expanding, revenue is growing, and total compensation per employee trends upward. The fact that Dr. Leamer's model suggests a negative relationship between these variables is unsupported by any economic theory that he has offered.

164.   The presence of counterintuitive and unexplained results is a significant flaw in Dr. Leamer's report.   Economists rely on economic theory to guide an analysis and give meaning to the results. For example, if, when estimating a demand curve for a product, an economist found that demand sloped upward (i.e., higher prices caused consumers to purchase more of a product), the economist would take that counterintuitive result as a signal that there was a flaw in the model and not trust the results of the model until the specification was tested and determined to be reliable such that it yielded reasonable predictions consistent with economic theory and market facts.

165.   Because Dr. Leamer's model produces counter-intuitive results and Dr. Leamer has not provided an explanation for why the unusual results are reasonable in this

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[265] Dr. Leamer acknowledged that the fact that his model gives the youngest employees larger impact "worries" him and that this result is "inappropriate." Leamer Deposition Vol. III., p. 953. ("A. And then when I get this anomaly, which worries me too, the fact that the youngest workers have the largest impact … I think it's inappropriate to think that the very youngest workers are going to have the most impact of the cold-call.")

[266] In fact, in deposition Dr. Leamer theorized that the youngest are probably not the target of cold-calling. Leamer Deposition Vol. III., p. 935. ("Q. You have also theorized that younger employees and employees with shorter tenure are less likely to be cold-called; correct? A. By the word "younger," I would say the youngest are probably not the target of cold-calling. Somebody who has just graduated from college and been hired in the first month, that seems to me unlikely to be the target of cold-calling.")

[267] See Leamer October 2013 Merits Report, Exhibit 2, variables #26, 28, and 29.

[268] See Kennedy, p. 139. ("Endogeneity gives rise to estimates biased even asymptotically….")

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market setting, one can have no confidence that the impact and damages he estimates from the model are reliable.

D.   Dr. Leamer Fails to Examine the Significance of His Class Period Variable Coefficients Using Clustered Standard Errors

166.   In response to criticism at the Class certification stage by Dr. Murphy, Dr. Leamer corrected the method by which he estimated the precision of his coefficient estimates to account for the fact that many of his explanatory variables vary only by employer and year, but not by employee.[269] While Dr. Leamer includes the corrected standard errors in Exhibit 3 to his report, he fails to address the fact that when his standard errors are correctly estimated, two of his four Class period variables are no longer significant.[270]

167.   Dr. Leamer dismisses the importance of this modification, saying it is "irrelevant for the task of determining the best estimate once the model is decided upon" because "[a] damage estimate with a large standard error will still be the best estimate."[271] However, while it is true that the coefficient estimates are unchanged using the corrected method of determining standard errors, Dr. Leamer is incorrect in suggesting that the standard errors of a regression are immaterial. The standard error of a coefficient estimate is what determines statistical significance, that is,

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[269] Dr. Leamer states in his Report that "not every single individual can be viewed as an independent 'experiment' for purposes of estimating standard errors." Leamer October 2013 Merits Report, ¶¶ 22 – 31. Clustering the standard errors is a "generally accepted method" to correct for this issue. Murphy November 2012 Report, ¶ 126.

[270] The determination of statistical significance is made using a p-value, defined as "the probability of drawing a statistic at least as adverse to the null hypothesis as the one you actually computed in your sample, assuming the null hypothesis is correct." (James H. Stock and Mark W. Watson, Introduction to Econometrics, (Pearson-Addison Wesley, 2003) ("Stock and Watson"), p. 62.) This is the probability that one would see the same relationship observed in the data if the relationship does not actually exist. Stock and Watson note, "In many cases, statisticians and econometricians use a 5% significance level…In some legal settings the significance level used is 1% or even .1%, to avoid this sort of mistake." (Stock and Watson, pp. 68-9.) Dr. Leamer describes the p-value of a coefficient as "another way of characterizing how much uncertainty there is in that particular coefficient." (Leamer Deposition Vol. III., p. 1036.) But he does not advocate rejecting the conduct variables because they are individually insignificant. Instead, he believes the appropriate null hypothesis is not zero damages, because he believes that the alleged agreements did suppress compensation for the entire Class; thus, his conduct variable must have a negative relationship to compensation. Instead of no conduct being the hypothesis to reject, Dr. Leamer suggests using 10 percent suppression as his hypothesis. Leamer Deposition Vol. III., p. 1037. ("Q. So setting the coefficient to zero is the null hypothesis; correct? A. That is a null hypothesis, and that is not the appropriate null hypothesis in this case. Q. What is the appropriate null hypothesis in this case? A. If you mean by null hypothesis zero damages, that seems to me to have been decided upon by all the textural and testimony and documents. And the question isn't whether there's zero damages; the question is how large they are. So I would suggest that Google's decision to do the across-the-board 10 percent increase in compensation in their big bang, that's the natural null hypothesis.") Typically, a null is constructed to be rejected, but the way Dr. Leamer has constructed his null, he cannot reject it, only accept it. (Stock and Watson, pp. 61 – 2.)

[271] Leamer October 2013 Merits Report, ¶ 26. As a threshold matter, it does not make sense to assert that the predictions of a model must be used in a damages analysis "once the model is decided upon" as Dr. Leamer asserts. Dr. Leamer's model fails to establish proof of impact, and therefore there is no basis to assert that the amount of alleged undercompensation predicted by the model represents damages.

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whether the model provides evidence that the true value of a coefficient is different from zero. If a coefficient estimate is not statistically significant, then the model has not found sufficient evidence to reject the null hypothesis that the true impact of the relevant variable is zero.

168.   An examination of Dr. Leamer's Exhibit 3 to his Merits Report shows that the switch to clustered standard errors is not "irrelevant." Using this model, two of Dr. Leamer's four coefficients meant to measure the impact of the alleged conduct at issue, the un-interacted Class period variable and the Class period variable interacted with the firm's hiring rate, are no longer significant. This means that Dr. Leamer's model has not been able to estimate these coefficients precisely enough to conclude that their true values are not, in fact, 0.

169.   **Exhibit V.12** shows the implied damages from Dr. Leamer's model broken down by his four Class period coefficients. Dr. Leamer's Class period indicator accounts for almost all of the damage estimate, adding $3.3 billion to his total damage amount.[272]

170.   **Exhibit V.13** shows the damages to the Class if it is assumed that the coefficients on the Class period indicator and the Class period variable interacted with hiring rate are 0. As mentioned above, Dr. Leamer's model does not find enough evidence to reject the hypothesis that 0 is the true value of the coefficients. Without the influence of the insignificant variables, damages to the Class are measured at about $414 million, a reduction of over $2.5 billion from Dr. Leamer's estimate.

171.   **Exhibits V.14** and **V.15** show the results of re-estimating Dr. Leamer's model without the two Class period variables that are statistically insignificant. As shown in the exhibits, the model containing only the statistically significant Class period variables from Dr. Leamer's original regression finds estimated damages of approximately $910 million, more than $2 billion less than Dr. Leamer's estimate.

172.   These calculations demonstrate that a substantial majority of Dr. Leamer's damage estimate is being driven by variables that are statistically insignificant. Despite Dr. Leamer's statements to the contrary, using clustered standard errors (a necessity given the alleged relationship between employees' compensation in each year derived from the Plaintiffs' theories about interconnected compensation due to somewhat rigid pay structures at the Defendants) casts substantial doubt on the validity of Dr. Leamer's claim that the Class was damaged by more than $3 billion.

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[272] Total damages are less than $3.3 billion because the effect of own hiring is to reduce damages, and the combined effect of the age and age squared specification adds significantly less to the total.

VI. Modifications to Dr. Leamer's Regression Model Demonstrate that His Alleged Damages Amount is Unreliable

173. As discussed above, Dr. Leamer's model is inconsistent with his theory of harm and yields results that are implausible in light of the nature and magnitude of the restriction alleged. In this section, I present several minor changes to Dr. Leamer's model. If the regression model were robust, I would expect these alterations to have minimal impact on the estimation of alleged damages. However, as will be shown below, reasonable amendments to Dr. Leamer's model undermine Dr. Leamer's contention that damages are in excess of $3 billion.

A.   Dr. Leamer's Results Rely on His Adjustment of Compensation by the CPI

174. Dr. Leamer adjusts all variables measured in dollars in his regression by the Consumer Price Index (CPI), which accounts for inflation. While this is not an unreasonable adjustment to make in some contexts, because of the recession that occurred during the Class period, it suggests that running the model on nominal figures would be expected to produce a more accurate result.

175. Defendants could not have consistently known with certainty what inflation was going to be in the coming year as they were setting the compensation of their employees. If one of the companies attempted to give an employee a large raise, but it turned out that inflation was much higher (or lower) than expected in the following year, Dr. Leamer's calculations would show that employee getting a much smaller (or larger) raise than the employer intended, or possibly even a decrease in real compensation. This possibility is realized in this case with the impact of the recession that occurred at the end of the conduct period. While inflation could have been anticipated to drop during this period, even economists were not able to predict the severity of the reduction. The Livingston Survey conducted by the Federal Reserve Bank of Philadelphia gauges economists' expectations on a number of different indices, including the CPI utilized by Dr. Leamer. In December 2008, economists' mean 12-month prediction of inflation was 1.2 percent, with the 12-month median prediction being 1.1 percent.[273] In actuality, the US economy experienced deflation during this period of -0.3 percent, based on the CPI figures used by Dr. Leamer in his regression data. Dr. Leamer asserted in deposition that firms are "aware" of inflation when making compensation decisions.[274] But Defendants Google and Intel made most of their

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[273] Median Data and Mean Data, Historical Data: Livingston Survey, available at http://www.phil.frb.org/research-and-data/real-time-center/livingston-survey/historical-data/, accessed on November 22, 2013.

[274] Leamer Deposition Vol. III., p. 925. ("Q. And so you would agree that in terms of modeling how administrators actually made compensation decisions, nominal compensation would be the way to go here? A. No, I don't agree with that. Q. Why is that? A. Well, these firms are aware of inflation…")

salary decisions in the first quarter of the year, well before the average CPI level that Dr. Leamer uses to adjust total compensation is determined.[275] With their compensation decisions made in advance of unforeseen changes in the inflation rate, Google and Intel were likely not "aware" that the real compensation of their employees was going to be greater than expected in 2009 due to a fall in the inflation rate, just as the conduct at issue allegedly ceased. The fact that this unforeseen shift happened at the end of the Class period presents issues for Dr. Leamer's regression, which relies on comparing wages during the Class period with those in other years.

176. When Dr. Leamer's model is run on nominal compensation (*i.e.*, the compensation that the Defendant companies can actually set and control), making only this and no other changes, it changes Dr. Leamer's estimate of damages to approximately $1.8 billion, substantially less than the $3.1 billion in damages originally estimated by Dr. Leamer's model. See **Exhibits VI.1 and VI.2**. Therefore, a considerable portion of Dr. Leamer's damages appear to be caused by changes in inflation; a fact that could not have been known by the Defendants and is unrelated to any alleged conduct.

B.   Dr. Leamer's Model Does Not Allow for Variation in the Effect of the Alleged Conduct across Defendants

177. Dr. Leamer's model allows for almost no variation in the alleged impact of the DNCC agreements between the Defendants. While there is some variation in the specific estimated damages due to differences in the employee age composition and hiring rates at different firms, the same four Class period-related coefficients apply to all seven Defendants. This means that while Intel's employees may be older than Google's, the effect of age on the impact of the conduct is the same at both Intel and Google. The only true variation by employer he allows for in his alleged damages calculation is in the estimation of the persistence effects of the alleged conduct over time, since he allows the coefficients on the previous years' compensation to vary by employer.[276]

178. Dr. Leamer imposes uniformity in the impact of the alleged conduct across the Defendants despite the fact that there was considerable heterogeneity in the way in which they set compensation, as discussed in earlier sections, and in the alleged

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[275] See Section III.3 and III.4. Google made compensation decisions in the first quarter of the year in 2005 and 2006, but in the fall beginning in 2007. (Wagner Declaration, ¶ 15.)

[276] However, as discussed Section V.A., including lagged compensation values in the regression model introduces other econometric problems to Dr. Leamer's damage model.

Modifications to Dr. Leamer's Regression Model Demonstrate that His Alleged
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conduct itself. As noted at the outset, not all Defendants had the same number of DNCC agreements.[277]

179.   Because Dr. Leamer's model imposes the condition that the alleged Class period coefficients are the same for all Defendants, adjustments that theoretically would only impact one Defendant in fact affect them all. As discussed above, I understand that Intel may not have entered into any sort of DNCC agreement until 2006, even though Dr. Leamer's model assigns Intel's Class period variable a value of 0.5 for the year 2005. I have re-estimated Dr. Leamer's model, with the only alteration being that Intel's Class period variable is set to 0 in 2005. See **Exhibits VI.3** and **VI.4**.[278]

180.   As can be seen on the exhibit, this change implies that total damages are reduced by over $1 billion as compared with Dr. Leamer's estimates. ██████████████ ██ ████████████████████. This shift in fair value price was not caused by the DNCC agreements. By using a 2005 start date for the agreement, Dr. Leamer is moving into his Class period variable a change in compensation that was unrelated to conduct and prior to Intel's agreement. Not only have the alleged damages estimated by the model been reduced for Intel, but all seven Defendants have lower damages than Dr. Leamer posits. This result demonstrates that Dr. Leamer's restriction that the effect of the alleged conduct be the same across the Defendants causes his model to estimate alleged damages in an illogical fashion.

181.   In **Exhibits VI.5** and **VI.6**, I have estimated Dr. Leamer's model without the restriction that the Class period coefficients be the same for all 7 Defendants.[279] Without the constraint that the effect of the alleged conduct be the same across all employers, the model estimates damages of approximately $1.2 billion, less than half of the alleged damages estimated by Dr. Leamer's model. Examining the results by Defendant, once Dr. Leamer's model is permitted to differentiate the alleged impact of alleged conduct between the firms, the model finds net overcompensation by Lucasfilm and Pixar in each year of the Class period. Google

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[277] See Section III and ¶¶ 10 and 11.

[278] **Exhibits VI.3** and **VI.4** show the results of running Dr. Leamer's model with Intel's Class period variable set to 0 in 2005 in real terms. The nominal model setting Intel's Class period variable to 0 appears in the Appendix (see **Appendix Exhibit VI.1** and **Appendix Exhibit VI.2**) and shows directionally similar results.

[279] Note that this model uses Dr. Leamer's Class period variable without the alteration for Intel described above. I have allowed the four Class period coefficients to vary by employer; in doing so, I have also allowed the 3 variables interacted with the Class period variable (age, squared age, hiring rate) to vary by employer as well. In allowing (for example) the effect of the Class period variable to vary by age and Defendant, it is necessary to allow the effect of age, un-interacted with the Class period variable, to vary by Defendant also. **Exhibits VI.5** and **VI.6** show the results of running Dr. Leamer's model disaggregating the Class period variable effects in real terms. The nominal disaggregated Class period variable model appears in the Appendix (see **Appendix Exhibit VI.3** and **Appendix Exhibit VI.4**) and shows directionally similar results.

Modifications to Dr. Leamer's Regression Model Demonstrate that His Alleged
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is estimated to have net overcompensation overall, though not in each individual year. Adobe's alleged damages are approximately one-third of those estimated by Dr. Leamer, while Apple's alleged damages are just over half of those from Dr. Leamer's original model. Intuit is found to have greater undercompensation than Dr. Leamer's model estimates when the effect of the alleged conduct is allowed to vary by employer.

C.   Dr. Leamer's Results Rely on His Aggregation of Total New Hires Across all Defendants as a Control Variable

182.   A significant shortcoming of Dr. Leamer's damage model is his failure to control for and test the impact of the information that was actually lost on compensation outcomes for the Class. As stated above, the specification of Dr. Leamer's damage model is inconsistent with his theory of harm. Nothing in Dr. Leamer's model measures changes in information available to the Class or tests whether the asserted reduction in cold-calls meaningfully changed the information available to Class members or altered the strength of their negotiating position. As stated above, a proper test of the theory would evaluate whether the magnitude of reduced information affects compensation as opposed to the mere existence of an agreement.

183.   One way of controlling for the magnitude of the alleged reduced information is to account for the volume of hiring being conducted by firms with which the reference firm has a DNCC agreement. Dr. Leamer's compensation regression includes the total number of new hires per year by all seven Defendants as an explanatory variable.[280] But this variable combines the impact of the hiring by firms with whom each Defendant has a DNCC agreement with the impact of hiring by other Defendants. Moreover, Dr. Leamer's new hire variable is the sum of the new hires by each Defendant firm in each year and is, therefore, the same for every employee in the data set in a given year and is restricted to have the same effect on compensation at every firm, regardless of the number and relative importance of each firm's DNCC agreements to their compensation structures.

184.   Dr. Leamer aggregates new hires across all Defendants despite the fact that his theory of harm suggests that the different components of this variable should have different effects on employee compensation. To see this, note that the new hires variable can be broken down into four distinct categories: (1) new hires at the employee's own firm; (2) new hires at another firm with which the employee's firm did not have a DNCC agreement; and (3) new hires at another firm with which the employee's firm had a DNCC agreement while that agreement was in effect; and (4) new hires at another firm with which the employee's firm had a DNCC agreement while that agreement was not in effect.

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[280] See Leamer October 2013 Merits Report, Exhibit 2, variable #28.

Modifications to Dr. Leamer's Regression Model Demonstrate that His Alleged
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185.   Dr. Leamer only allows the impact of new hires at the employee's own firm to be
different from the impact of other new hires.[281] However, his model forces the
compensation effect of hiring by the other Defendants to be the same regardless of
whether the firm had a DNCC agreement in place with each Defendant.

186.   It is inconsistent with Dr. Leamer's theories in this case for the compensation effect
of new hires from firms with which the employee's firm had a DNCC agreement to
be the same as the compensation effect of new hires from firms with which the
employee's firm did not have a DNCC agreement. If the effect on compensation of
the two categories were the same that would imply that the DNCC agreements
should, in fact, have no effect, since any firm's new hires would put the same
pressure on another employer's wages regardless of whether a DNCC agreement
was in place at the time. Given that Dr. Leamer's "total new hires" variable's
constituent parts are not expected to have the same effect on employee
compensation under Plaintiffs' overarching theory of harm, it is inappropriate to
aggregate them into a single variable in the regression model, which forces the
model to estimate a common impact.

187.   As a correction to the misspecification embodied by the new hires variable, I have
estimated Dr. Leamer's compensation regression by splitting his variable into its
component parts. As noted above, new hires in category (1) were already taken into
account in Dr. Leamer's model, so I have replaced the total new hires variable with
3 new variables allowing me to estimate the differential impact from groups (2), (3),
and (4). Splitting apart the new hires variable in this fashion allows the model to
reflect variation across firms since each firm has its own unique set of firms with
which it has a DNCC agreement(s) in each year of the alleged Class period.

188.   The added variables comprise a measure of group (2) directly (the new hires at
firms with which the employee's firm never had an agreement). To estimate the
impact of groups (3) and (4) separately, I include the new hires at the firms with
which the employee's firm did have a DNCC agreement both as a standalone
variable and interacted with the Class period variable, allowing me to estimate how
the impact of this variable changed within the Class period (if at all). This model
should improve upon Dr. Leamer's estimation as it allows for greater flexibility and
is more consistent structurally with Plaintiffs' theory. In addition, by construction
this model takes into account the magnitude of the importance of the DNCC
agreements in allegedly suppressing outside opportunities to employees at the firm.
If a firm with which the employee's company had a DNCC agreement starts to do
more hiring, and thus there are more opportunities for cold calls from which the
employee is excluded, the model will automatically react to this via the added new
hire variables. The damages estimated by this specification of Dr. Leamer's model

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[281] See Leamer October 2013 Merits Report, Exhibit 2, variable #27.

Modifications to Dr. Leamer's Regression Model Demonstrate that His Alleged
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(which adds only flexibility, but does not fundamentally change his approach to damages) are approximately $543 million. See **Exhibits VI.7** and **VI.8**.[282]

189.   I have also estimated a version of this model in which the new hires from groups (2), (3), and (4) are scaled by the number of employees currently at the firm, and so represent the number of new hires from the various groups as a share of the firm's extant workforce. This mirrors the fashion in which Dr. Leamer included the new hires from group (1) in his original regression. The results of this model show net overcompensation by the Defendants during the Class period; in fact, only 2005 is estimated to have positive alleged damages, in this case equal to about $20 million. See **Exhibits VI.11** and **VI.12**.[283]

190.   The results of these minor modifications to Dr. Leamer's compensation regression show that the vast majority of his damage estimate is driven by his overly restrictive specification and unsupported assumption that all of the DNCC agreements had the same impact on all Defendants regardless of how many missed cold-call opportunities were associated with each agreement. Minor modifications to Dr. Leamer's model that are consistent with Plaintiffs' underlying theory and the evidence produced in this case show that Dr. Leamer's damage estimate is unreliable and unconnected to the alleged conduct at issue. Dr. Leamer's measure of the alleged conduct is too blunt an instrument to isolate the impact of the agreements at issue from other concurrent events, and therefore causes him to find damages unreliably.

191.   In the following section, I discuss other factors that affect Dr. Leamer's damage estimate, but that cannot be corrected within the damages framework that Dr.

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[282] **Exhibits VI.7** and **VI.8** show the results of running Dr. Leamer's model using the modified new hires variables in real terms. The nominal model using modified new hires variables appears in the Appendix (see **Appendix Exhibits VI.5** and **VI.6**) and shows directionally similar results. Another alternative I have estimated is to replace Dr. Leamer's new hires variable with the median income from the tech sector from the previous year, along with the change in the median income from the year before. The median income should capture a similar effect (upward pressure on wages due to the market) without having the issues described above. This model demonstrates how reliant Dr. Leamer's results are on his problematic new hires variable. The median income model not only shows no undercompensation as a result of the conduct at issue, but in fact estimates that the Class was overcompensated by approximately $3 billion (a figure nearly as large in absolute value as Dr. Leamer's own estimation of alleged damages). See **Exhibits VI.9** and**VI.10**. These exhibits show the results of the model in real terms. The nominal model replacing new hires with median wage appears in the Appendix (see **Appendix Exhibits VI.7**and**VI.8**) and shows directionally similar results.

[283] **Exhibits VI.11** and **VI.12** show the results of running Dr. Leamer's model using the modified new hires variables calculated as shares in real terms. The nominal model using modified new hires variables calculated as shares appears in the Appendix (see **Appendix Exhibits VI.9** and **VI.10**) and shows directionally similar results. See also **Exhibits VI.13** and **VI.14**. These exhibits show the results of running the model in **Exhibits VI.11** and **VI.12**, but also changing the Class period variable for Intel in 2005 to 0, as discussed above. Similar to those exhibits, this model shows no aggregate alleged damages. These are the results of running Dr. Leamer's model using the modified new hires variables calculated as shares and setting Intel's Class period variable in 2005 to 0 in real terms. The nominal model using modified new hires variables calculated as shares and setting Intel's Class period variable in 2005 to 0 appears in the Appendix (see **Appendix Exhibits VI.11** and **VI.12**) and shows directionally similar results.

Dr. Leamer's Aggregate Damage Model Is Too General

Leamer proposes. There is no basis to support Dr. Leamer's opinion that the more than $3 billion in damages he calculates comes from the alleged conduct at issue as opposed to misspecification of his model or other contemporaneous events such as the 2008-2009 recession.

VII.   Dr. Leamer's Aggregate Damage Model Is Too General

192.   The review in the background section of the Defendants' compensation practices and events over the relevant period suggests the following: 1) the total and average compensation to the Class has trended upward in the Class period for all of these Defendants, and 2) despite volatility due to events that may have affected compensation, there does not appear to be a consistent pattern of changes to compensation practices at these firms concurrent with the timing of the DNCC agreements.

193.   Several events that affected compensation occurred during the Class period. ███, ███, Google's ████████ program in 2007 and Intel's hiring freeze in 2006.   Despite the drops in Class compensation during the Class period as a result of such changes, none of these events have been shown by Plaintiffs to be the result of Defendants' alleged conspiracy to suppress compensation through the implementation of DNCC agreements. In addition, some of the compensation events that occurred during the Class period had a positive impact on Class compensation, such as the increase in Adobe's benchmark targets in 2008, Intel's Option Exchange program in 2009, and the increase in Google's benchmark target in 2007.[285] Some of these events were publicly announced in financial documents or to the Defendants' employees.

194.   Despite occasional decreases in average compensation, the overall trend through the relevant period has been for average Class member compensation to increase. The exhibits described in Section III do not suggest an overall change in pattern to average compensation, or any aspect of compensation, that was implemented during the period of alleged conduct. Despite the lack of visible suppression to the compensation of the Class, Dr. Leamer's very general model finds substantial damages payable to every member of the Class.

195.   Most of Dr. Leamer's $3 billion in damages are generated from his Class period indicator variable.[286] However, Dr. Leamer's Class period variable is incapable of isolating the impact of the alleged conduct on compensation from other concurrent

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[284] See III.A.1; III.A.2; III.A.3 and III.A.4.

[285] See III.A.1; III.A.3 and III.A.4.

[286] See **Exhibit V.12**.

Dr. Leamer's Aggregate Damage Model Is Too General

events. We call this kind of an indicator variable a Fixed Effect, because it is designed to account for things that are "fixed" across what it is covering, in this case time, Defendants, and individual Class members. An indicator variable estimates a single effect on the dependent variable for all observations where it is turned on.

196.   There are at least four problems with Dr. Leamer's Class period fixed effect:[287] 1) it does not allow for an impact of the 2008-2009 recession that would negatively have affected compensation for substantial parts of the Class during these years; 2) it does not allow for variation in how each of the Defendants responded to the recession when setting compensation; 3) it cannot identify employees who continued to receive market driven pay increases based on cold-calls or raises due to pressure from non-Defendant rival employers; and 4) it conflates the impact, if any, of the challenged agreements with the logically similar impact of concurrent agreements with similar terms that were entered into at roughly the same time as the agreements in question.

197.   The inability of Dr. Leamer's model to disentangle the impact of the alleged conduct at issue from the effect on compensation of independent events outside the control of the Defendants makes his damage model unreliable and causes Dr. Leamer to overstate damages, if indeed there are any.

A.   Dr. Leamer's Damage Model Does Not Account for the Negative Impact of the Recession on Compensation Outcomes

198.   In his October 2012 report, Leamer says that the effect of the DNCC agreements on employee compensation can be estimated "by contrasting compensation during the period when the Agreements were in effect with compensation before and after" that period.[288] He goes on to state that a "search for comparison periods needs to be sensitive to the economic cycle," including the "severe global recession" in 2008 and 2009.[289]

199.   In his "preliminary informal impact assessment," Dr. Leamer observes that the recession years, 2008 and 2009, fall during the Class period, but a direct comparison to the outside Class years may not be possible.[290] By this he means, without a "severe global recession" outside of the Class period, there is no benchmark for the kind of wage growth to expect during this kind of economic

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[287] The other Class period variables in Dr. Leamer's model are all interacted with his Class period indicator variable, and are therefore subject to the same concerns.

[288] Leamer October 2012 report, ¶ 136.

[289] Leamer October 2012 report, ¶ 137.

[290] Leamer October 2012 report, ¶ 140.

disturbance when compensation setting is free from the influence of the DNCC agreements. To address the recession in his preliminary informal impact assessment, he gave 2008 and 2009 zero values for the "estimated underpayment" in each year, based on "the idea that the weak economy would not have resulted in increases in those periods."[291]

200.   At the conclusion of this preliminary impact assessment, Dr. Leamer states that "[r]egression analysis is a better approach because it allows the choice of comparison period to be "constructed" statistically," but his approach to identifying the impact of the Class period still uses the same comparison periods.[292] Moreover, despite the importance of being sensitive to economic downturns, Dr. Leamer does not control for the impact of the recession on the Defendants' compensation in his regression model.[293]

201.   Applying the same technique that Dr. Leamer applied in his preliminary impact assessment of zeroing out the contribution of 2008 and 2009 on cumulative damages reduces Dr. Leamer's damage estimate for the Class to about $1.2 billion, which indicates that the recession years contribute to more than half of his total damage estimate. As I discussed in the compensation sections in the background section, each Defendant had a different approach to compensation in the face of the financial uncertainty generated by the recession. In 2009, Intel instituted a pay freeze and ██ ██████, while ██.

202.   A simple way for identifying whether the recession years are an important factor in Dr. Leamer's damage estimation is to isolate each year's effect on compensation during the Class period.[295] As with Dr. Leamer's model, the annual coefficients on the Class period years are insignificant at 5 percent. However, to analyze which years contribute the most to his damage estimate, I list the coefficient on the individual Class period-year indicators in the table below. In 2005 and 2006, the coefficient on Class period is positive, suggesting that none of Dr. Leamer's damages amount is being driven by compensation outcomes in these years. Instead,

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[291] Leamer October 2012 report, ¶ 140.

[292] Leamer October 2012 report, ¶ 141.

[293] Leamer Deposition Vol. III., pp. 992 – 3. ("Q: Now you would agree that your model should account for the impact of the recession that occurred in 2008 and 2009? A: That's correct. Q: In fact the model should account for the impact of any significant downturn or upturn during the conduct period? A: That's correct.")

[294] See III.A.1; III.A.2 and III.A.3.

[295] This solution replaces Dr. Leamer's single fixed effect with five fixed effects. This solves the problems relating to changes within the Class period. However, since these are still fixed effects, many of the other problems discussed in this section will also be true for these values. Therefore, this analysis is more of a way to isolate the impact of the recession, than it is a way to solve the flaws in Dr. Leamer's model.

Dr. Leamer's Aggregate Damage Model Is Too General

all of the impact being measured by Dr. Leamer's Class period variable is being driven by the last three years of his Class period. See **Exhibits VII.1** and **VII.2**.[296]

Table 2

Coefficients on Class Period-Year Indicators

Variable	Coefficient
conduct_2005	0.16
conduct_2006	0
conduct_2007	-0.08
conduct_2008	-0.09
conduct_2009	-0.41

203.   It is not possible to control for events that affected employees at individual firms in specific years within Dr. Leamer's model. One theoretical approach to doing so would be to add annual fixed effect variables for each individual Defendant – sixty additional variables. However, there are insufficient degrees of freedom in Dr. Leamer's model to include individual Defendant's annual fixed effects, even though the impact of the recession is certainly independent of the conduct at issue, and each firm reacted to the recession in different ways.[297] Similarly, while running separate regressions for each of the Defendants that include annual fixed effects would potentially cure the problem, that solution can also not be implemented because the models will not have enough degrees of freedom in the individual regressions.

204.   Finally, as noted above, the economy began to turn around in 2009, which is coincident in time with the end of Dr. Leamer's Class period. The coincidence in time of the economic recovery and end of the Class period means that Dr. Leamer's model cannot determine how much of the compensation improvement outside the Class period should be assigned to the end of the recession and how much should be assigned to the end of the DNCC agreements.

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[296] **Exhibits VII.1** and **VII.2** show the results of running Dr. Leamer's model interacting the Class period variable with annual indicators in real terms. The nominal model interacting the Class period variable with annual indicators appears in the Appendix (see Appendix **Exhibits VII.1** and **VII.2**) and generally shows directionally similar results.

[297] Leamer December 2012 Reply Report, ¶ 101. ("Complete disaggregation would require an entirely distinct model for each Defendant…this would reduce the number to at most 11 annual observations for each Defendant, and it would be impossible to estimate a model of the scope of mine with so few time-series experiments.")

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY   Dr. Leamer's Aggregate Damage Model Is Too General

B.   Dr. Leamer's Model Cannot Distinguish Employees who Received Market Wages and are Unharmed from Employees who Allegedly Failed to Benefit from Any Ripple Effect

205.   Dr. Leamer's Class period indicator generates a suppression percentage in each year for all individuals in each firm. Even employees that received the largest raises in compensation in each year are estimated to have experienced compensation suppression from Dr. Leamer's Class period variable, even if the compensation changes were deliberately designed to retain an employee who had an external job offer. Moreover, because Dr. Leamer measures impact as a percentage of compensation regardless of each Class member's compensation history, Class members who received substantial raises, putting them at the top of the compensation distribution for their firm, are estimated to have the greatest damages at each firm.

206.   The most dramatic examples of this issue with Dr. Leamer's model come from the ▊▊▊▊▊▊▊▊▊▊ employees. As discussed above, the ▊▊▊▊▊▊▊▊▊▊ ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊ ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊ ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊ Dr. Leamer estimates $67 million in damages (about $471,000 each) for this small group of employees in the same year of their substantial ▊▊▊▊▊▊▊▊▊ grants. These employees have an average suppression percentage of 14 percent and their damages represent almost 9 percent of Google's overall damages. Despite the large salary increases, Dr. Leamer's model assigns these Class members a disproportionate share of the damages. The Class employees that received the ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊ ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊ ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊

207.   While Dr. Leamer finds these employees were significantly harmed due to an alleged reduction in information about their market worth, an email from the period shows that Google believed these grants were "▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊ ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊ ▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊▊"[301] Dr. Leamer has no basis to believe that (1) Google was suppressing these employees' wages or (2)

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[298] See Section IV.E.2.d.

[299] Dr. Leamer's regression data.

[300] Dr. Leamer's regression data.

[301] Letter from Laszlo Bock, GOOG-HIGH-TECH-00519082.

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that these individuals should have received about █████████ on average instead of ████████.

208.   Moreover, Dr. Leamer interacts his Class period indicator with age and age squared which he claims "explicitly allows for the possibility that the effect on compensation levels is different for young employees and for employees with short tenure at their firms, and so the effect of the agreements on employees at a firm might vary according to the firm's composition in this regard."[302] Setting aside persistence effects, what Dr. Leamer actually does is give the same suppression percentage in each year for all individuals in a particular company with the same age. Even employees that received the largest raises in compensation in each year receive the same percentage suppression from Dr. Leamer's Class period variables as all the other employees in their age cohort.

209.   For example, **Exhibit VII.3** compares two Google employees who were employed over Dr. Leamer's entire Class period and who were the same age and had a similar income in 2005. Based on Dr. Leamer's model these two employees were similarly situated, and in each year have the exact same suppression percentages. The first employee was a ███████████ grant recipient and the second employee was not. Over the course of Dr. Leamer's Class period the first employee earned almost ███ █████ and was undercompensated by almost ████████ By contrast, the second employee earned just over ████████ and was undercompensated by almost ███████. These results run contrary to Dr. Leamer's theory of harm. The employee who Google was concerned about retaining received the kind of preemptive change in compensation that Dr. Leamer claims is expected, yet is determined to have been harmed by more than 6-times a similarly situated colleague who did not receive the preemptive compensation change.

C.   Dr. Leamer's Model Cannot Distinguish the Impact, if any, of the Challenged DNCC Agreements from Other DNCC Agreements

210.   As noted above, Dr. Leamer treats all of the DNCC agreements in the same fashion regardless of the importance of each firm with which it has a DNCC agreement to the flow of information to the firm's TCR employees. Even if Dr. Leamer had established that DNCC agreements meaningfully affected information flow to the Class and did so in a uniform manner, his compensation model cannot distinguish between the DNCC agreements at issue and those that are not part of this case. In his October 2012 report, Leamer points out that Defendants potentially entered into several other agreements during the Class period.[303] Because these agreements

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[302] Leamer December 2012 Reply Report, ¶ 30.

[303] "I also understand that Defendants entered into several additional agreements. Those agreements include: (1) an agreement between Pixar and Intel that began in approximately October 2008, and (2) agreements Apple apparently had with Intel, Intuit, and Lucasfilm." (Leamer October 2012 Report, ¶ 22.)

were allegedly entered into during the Class period, the impact, if any, of these unchallenged agreements is conflated with the impact, if any, of the agreements challenged as unlawful in this lawsuit.

D.   Dr. Leamer's Fixed Effect Is Too Blunt to Accurately Estimate the Impact of the Alleged Conduct

211.   As discussed in the preceding sections, the Class period fixed effect used by Dr. Leamer in his compensation regression captures all of the variation associated with the Class period, regardless of whether or not it was related to the DNCC agreements. The result of this is that the estimated "under compensation" alleged by Dr. Leamer is in fact a broad average of many different factors.

212.   **Exhibits VI.3** and **VI.4** display the results of Dr. Leamer's compensation regression assuming that Intel did not begin participating in the alleged conspiracy until 2006. As one would expect, Intel's alleged damages are reduced by starting the Class period indicator for Intel in 2006. However, a result that is less intuitive is that the alleged damages calculated by the model also change for the other six Defendants, despite no change in how those six Defendants' alleged conduct is measured. Approximately one-third of Dr. Leamer's estimated damages for Adobe, Apple, Google, Intuit, Lucasfilm, and Pixar disappear despite the fact that no change was made to any of the variables or related to the other firms or the values of any of the individuals in the data. This demonstrates how Dr. Leamer's fixed effect captures the full amount of variation for the period in which it is turned "on," such that the estimation of damages for (for example) Adobe is altered even without any alteration in Adobe's compensation behavior or conduct at issue.

213.   This example shows the danger of aggregating impact into one, averaged, fixed effect variable. The fact that changes to Intel, for example, have such a profound effect on the other Defendants demonstrates that the instrument he uses to gauge the impact, if any, of the conduct at issue is not nearly granular enough to provide a reliable estimate of damages.

VIII. Summary

214.   Dr. Leamer has not put forward any reliable evidence that Defendants' DNCC agreements have caused harm to Plaintiffs. Dr. Leamer did not analyze the impact of the agreements at issue on information available to the Class, and he has no basis to assume that information was even diminished during the alleged Class period. Average compensation to the Class increased overall from 2005 to 2010 and declines in compensation during that period are related to economic events unrelated to the DNCC agreements. Dr. Leamer's damage model contains flaws that make it unreliable. His model suffers from specification errors and yields

counter-intuitive signs, rendering his results meaningless. Moreover, his model is not robust and minor changes to his damage model greatly diminish or eliminate any damages. As a result, Dr. Leamer's model cannot be used to estimate damages reliably.

Signed this 25th day of November, 2013:

Lauren Stiroh

Lauren J. Stiroh

NERA
ECONOMIC CONSULTING

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Exhibit 1

LAUREN J. STIROH
Senior Vice President

Dr. Stiroh specializes in the economics of antitrust, intellectual property, and commercial damages. She has conducted research, prepared expert reports, and testified in court on a variety of issues arising from antitrust allegations such as monopolization, exclusionary conduct, tying, vertical restrictions, price fixing, predatory pricing, price discrimination, and abuse of standard setting. Dr. Stiroh has analyzed the competitive effects of mergers, acquisitions, and joint ventures. She has also written expert reports and consulted on matters related to assessing impact and damages in class action litigation. She has performed or critiqued damage calculations in more than a dozen industrial settings.

Dr. Stiroh has also written and testified on the subject of intellectual property value and valuation. She has assessed and critiqued damages from patent, copyright, and trademark infringement in industries including semiconductors, biotechnology, pharmaceuticals, medical devices, and consumer products. Dr. Stiroh is co-editor and contributing author of *Economic Approaches to Intellectual Property Policy*, *Litigation and Management*, published in 2005.

Much of Dr. Stiroh's work and research focuses on the intersection of antitrust and intellectual property litigation. She has written articles and given speeches on this subject for the American Bar Association, Law Seminars International, the Practicing Law Institute, and the 2002 US Department of Justice and Federal Trade Commission joint hearings on "Competition and Intellectual Property Law and Policy in the Knowledge-Based Economy." She has analyzed market power in technology markets and evaluated the competitive implications of licensing arrangements, including tying and patent pooling provisions. In 2010 she participated in the ABA Stanford Law School Symposium on Antitrust and Innovation.

Dr. Stiroh has presented her research before the FTC, the DOJ, the Canadian Competition Bureau, and in expert testimony. In 2010 she was inducted into the YWCA-NYC Academy of Women Leaders.

Dr. Stiroh holds a Ph.D. in Economics from Harvard University, an M.A. in Economics from the University of British Columbia and a B.A. in Economics from the University of Western Ontario.

Lauren J. Stiroh

Education

Harvard University
Ph.D., Economics, August 1996

University of British Columbia
M.A., Economics, November 1991

University of Western Ontario

B.A., Economics, June 1990

Professional Experience

NERA Economic Consulting

March 2005-   *Senior Vice President.* Directs projects in the economics of antitrust, intellectual property and consumer damages.

2002-2005   *Vice President.*

1999-2002   S*enior Consultant*.

1996-1999   *Senior Analyst*.

Unidad de Desarrollo Social

March 1994   *Consultant*. Prepared two studies for the National Planning Department concerning the
August 1994   effect of the trade liberalization in Colombia on the distribution of income.

Harvard University

1994-1996   *Research Assistant.* Research Assistant for Professor Dale Jorgenson. Estimated human capital and national income accounts.

Harvard University

1993-1996   *Teaching Fellow in Economics.* Taught principles of economics, the introductory and core course in economics at Harvard College.

Honors and Professional Activities

YWCA-NYC Academy of Women Leaders, Class of 2010.

Vice-Chair, American Bar Association, Section of Antitrust Law, Trial Practices Committee.

Member, American Economic Association.

Derek Bok Teaching Award, 1996.

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Lauren J. Stiroh

Harvard University Scholarship 1991-1994.
Social Sciences and Humanities Research Council of Canada Fellowship 1991-1994.

University Graduate Fellowship (University of British Columbia) 1990-1991.
Huron College Corporation Scholarship (University of Western Ontario) 1987-1989.

Expert Testimony and Reports (2009-2013)

In Re NCAA Student-Athlete Name & Likeness Licensing Litigation

Expert Rebuttal Report on behalf of Defendant, National Collegiate Athletic Association in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* November 6, 2013.

Deposition testimony on behalf of Defendants, The Collegiate Licensing Company, Electronic Arts, Inc. and National Collegiate Athletic Association in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* October 11, 2013.

Expert Merits Report on behalf of Defendants, The Collegiate Licensing Company, Electronic Arts, Inc. and National Collegiate Athletic Association in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* September 25, 2013.

Reply Report on behalf of Defendants, The Collegiate Licensing Company, Electronic Arts, Inc. and National Collegiate Athletic Association in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* May 30, 2013.

Reply Declaration in Support of Defendant National Collegiate Athletic Association's Motion for Summary Judgement in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* May 30, 2013 (with Dirk van Leeuwen).

Deposition testimony on behalf of Defendants, The Collegiate Licensing Company, Electronic Arts, Inc. and National Collegiate Athletic Association in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* April 3, 2013.

Expert Report on behalf of Defendants, The Collegiate Licensing Company, Electronic Arts, Inc. and National Collegiate Athletic Association in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* March 14, 2013.

Declaration in Support of Defendant National Collegiate Athletic Association's Motion for Summary Judgement in connection with *In Re: NCAA Student-Athlete Name & Likeness Licensing Litigation,* March 14, 2013 (with Dirk van Leeuwen).

Lauren J. Stiroh

In the matter of Karen McPeters and Byron Barclay vs. LexisNexis

Amended Expert Report on behalf of Defendant, LexisNexis in connection with *Karen McPeters and Byron Barclay vs. LexisNexis,* September 17, 2013.

Expert Report on behalf of Defendant, LexisNexis in connection with *Karen McPeters and Byron Barclay vs. LexisNexis,* August 30, 2013.

In Re Photochromic Lens Antitrust Litigation

Deposition testimony on behalf of Defendant, Transitions Optical, Inc. in connection with *In Re Photochromic Lens Antitrust Litigation-Achtman et al. Plaintiffs,* January 16, 2013.

Expert Report on behalf of Defendant, Transitions Optical, Inc. in connection with *In Re Photochromic Lens Antitrust Litigation-Achtman et al. Plaintiffs,* December 3, 2012.

Deposition testimony on behalf of Defendants, Transitions Optical, Inc. and Essilor of America, Inc., in connection with *In Re Photochromic Lens Antitrust Litigation-Nouveau Vision, Inc. et al. Plaintiffs,* January 10, 2013.

Expert Report on behalf of Defendants, Transitions Optical, Inc. and Essilor of America, Inc., in connection with *In Re Photochromic Lens Antitrust Litigation-Nouveau Vision, Inc. et al. Plaintiffs,* December 3, 2012.

Insight Equity A.P.X, LP, d/b/a Vision-Ease Lens Worldwide v. Transitions Optical, Inc.

Deposition testimony on behalf of Defendant, Transitions Optical, Inc. in connection with *Insight Equity A.P. X., LP, d/b/a Vision-Ease Lens Worldwide v. Transitions Optical, Inc.*, January 9, 2013.

Expert Report on behalf of Defendant, Transitions Optical, Inc. in connection with *Insight Equity A.P. X., LP, d/b/a Vision-Ease Lens Worldwide v. Transitions Optical, Inc.*, December 3, 2012.

News America Marketing In-Store Services, LLC v. Yves Anidjar, et al.

Deposition testimony on behalf of Plaintiff, News America Marketing In-Store Services, LLC in connection with *News America Marketing In-Store Services, LLC v. Yves Anidjar, et al.*, May 9, 2012.

Expert Report on behalf of Plaintiff, News America Marketing In-Store Services, LLC in connection with *News America Marketing In-Store Services, LLC v. Yves Anidjar, et al.*, April 13, 2012.

4

FutureFuel Chemical Company v. National Biodiesel Board

> Expert Report on behalf of Defendant, National Biodiesel Board in connection with *FutureFuel Chemical Company v. National Biodiesel Board*, April 13, 2012.

M.V.B. Collision, Inc., d/b/a Mid Island Collision v. Allstate Insurance Company

> Supplemental Report on behalf of Defendant, Allstate Insurance Company in connection with *M.V.B. Collision, Inc. v. Allstate Insurance Company,* March 30, 2012.

> Testimony on behalf of Defendant, Allstate Insurance Company in the United States District Court for the Eastern District of New York in connection with *M.V.B. Collision, Inc., d/b/a Mid Island Collision v. Allstate Insurance Company,* January 30, 2012.

> Expert Report on behalf of Defendant, Allstate Insurance Company in connection with *M.V.B. Collision, Inc. v. Allstate Insurance Company,* December 1, 2009.

Arkema, Inc. and Arkema France v. Honeywell International, Inc.

> Deposition testimony on behalf of Plaintiffs, Arkema, Inc. and Arkema France in connection with *Arkema, Inc. and Arkema France v. Honeywell International, Inc.*, December 22, 2011.

> Expert Report on behalf of Plaintiffs, Arkema, Inc. and Arkema France in connection with *Arkema, Inc. and Arkema France v. Honeywell International, Inc.,* December 13, 2011.

Fred Potok, Individually and as Trustee of FLOORgraphics, Inc. Minority Shareholder Trust, v. Richard Rebh; George Rebh; Michael Devlin; Yves Anidjar; FLOORgraphics, Inc.; News America Marketing In-Store Services, LLC; News America Marketing In-Store LLC and News America Marketing In-Store Services, Inc.

> Expert Report on behalf of Defendants, News America In-Store Services LLC et al. in connection with *Fred Potok, Individually and as Trustee of FLOORgraphics, Inc. Minority Shareholder Trust, v. Richard Rebh et al.,* October 17, 2011.

Specialty Retailers, Inc. v. Main Street NA Parkade, LLC and Label Shopper Corporate Store, LLC

> Trial testimony on behalf of Defendants, Main Street NA Parkade, et al. in connection with *Specialty Retailers, Inc. v. Main Street NA Parkade, LLC and Label Shopper Corporate Store, LLC,* March 24, 2011.

> Deposition testimony on behalf of Defendants, Main Street NA Parkade, et al. in connection with *Specialty Retailers, Inc. v. Main Street NA Parkade, LLC and Label Shopper Corporate Store, LLC,* February 11, 2011.

Lauren J. Stiroh

Expert Report on behalf of Defendants, Main Street NA Parkade, et al. in connection with *Specialty Retailers, Inc. v. Main Street NA Parkade, LLC and Label Shopper Corporate Store, LLC,* December 17, 2010.

Carl Blessing, et al. v. Sirius XM Radio, Inc.

Deposition testimony on behalf of Defendant, Sirius XM Radio, Inc., in connection with *Carl Blessing, et al. v. Sirius XM Radio, Inc.*, March 15, 2011.

Expert Report on behalf of Defendant, Sirius XM Radio, Inc., in connection with *Carl Blessing, et al. v. Sirius XM Radio, Inc.*, January 4, 2011.

SanDisk Corporation v. Phison Electronics Corp., et al.

Deposition testimony on behalf of Plaintiff, SanDisk Corporation in connection with *SanDisk Corporation v. Phison Electronics, Corp., et al.,* January 19, 2011.
Expert Report on behalf of Plaintiff, SanDisk Corporation in connection with *SanDisk Corporation v. Phison Electronics, Corp., et al.,* December 22, 2010.

Boston Scientific Corporation v. Medinol Ltd.

Testimony on behalf of Defendant, Medinol, Ltd. in the arbitration hearing in connection with *Boston Scientific Corporation v. Medinol, Ltd.,* September 8, 2010.

Supplemental Report on behalf of Defendant, Medinol, Ltd. in connection with *Boston Scientific Corporation v. Medinol, Ltd.,* September 2, 2010.

Expert Report on behalf of Defendant, Medinol, Ltd. in connection with *Boston Scientific Corporation v. Medinol, Ltd.*, June 11, 2010.

Re The New City of Toronto Third Party Sign Tax and Sign By-Law

Cross-Examination testimony on behalf of Pattison Outdoor Advertising LP in connection with *The New City of Toronto Third Party Sign Tax and Sign By-Law,* August 13, 2010.

First Supplementary Affidavit and Second Supplementary Affidavit on behalf of Pattison Outdoor Advertising LP in connection with *The New City of Toronto Third Party Sign Tax and Sign By-Law,* July 23, 2010.

Expert Report, Affidavit and Supplemental Affidavit on behalf of Pattison Outdoor Advertising LP in connection with *The New City of Toronto Third Party Sign Tax and Sign By-Law*, April 13, 2010.

Lauren J. Stiroh

Netscape Communications Corporation, v. ValueClick, Inc., et al.

> Deposition testimony on behalf of Plaintiff, Netscape Communications Corporation in connection with *Netscape Communications Corporation v. ValueClick, Inc., et al.,* September 17, 2009.

> Rebuttal Report on behalf of Plaintiff, Netscape Communications Corporation in connection with *Netscape Communications Corporation v. ValueClick, Inc., et al.,* September 11, 2009 (with Christine S. Meyer).

> Expert Report on behalf of Plaintiff, Netscape Communications Corporation in connection with *Netscape Communications Corporation v. ValueClick, Inc., et al.,* August 31, 2009 (with Christine S. Meyer).

United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.

> Declaration in Further Support of Defendants, Dey, Inc., Dey L.P., and Dey L.P., Inc.'s Motion for Partial Summary Judgment in connection with *United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.,* August 27, 2009.

> Supplemental Declaration in Support of Defendants, Dey, Inc., Dey L.P., and Dey L.P., Inc.'s Motion for Partial Summary Judgment in connection with *United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.,* June 29, 2009.

> Declaration in Support of Defendants, Dey, Inc., Dey L.P., and Dey L.P., Inc.'s Motion for Partial Summary Judgment in connection with *United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.,* June 25, 2009.

> Deposition testimony on behalf of Defendants, Dey, Inc., Dey L.P., Inc., and Dey L.P. in connection with *United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.,* May 12-13, 2009.

> Rebuttal Report on behalf of Defendants, Dey, Inc., Dey L.P., Inc., and Dey L.P. in connection with *United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.,* May 7, 2009.

> Expert Report on behalf of Defendants, Dey, Inc., Dey L.P., Inc., and Dey L.P. in connection with *United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.,* March 6, 2009.

> Declaration in Support of Defendants, Dey, Inc., Dey L.P., Inc., and Dey L.P.'s Motion to Compel Discovery in connection with *United States of America ex rel. Ven-A-Care of the Florida Keys, Inc., v. Dey, Inc.,* February 11, 2009.

Abbott Laboratories, et al. v. Church & Dwight, Inc.

> Deposition testimony on behalf of Plaintiff, Abbott Laboratories in connection with *Abbott Laboratories, et al. v. Church & Dwight, Inc.,* July 1, 2009.

> Rebuttal Report on behalf of Plaintiff, Abbott Laboratories in connection with *Abbott Laboratories, et al. v. Church & Dwight, Inc.,* May 29, 2009.

> Expert Report on behalf of Plaintiff, Abbott Laboratories in connection with *Abbott Laboratories, et al. v. Church & Dwight, Inc.,* April 17, 2009.

Lanard Toys, Ltd. v. Dollar General Corporation, et al.

> Expert Report on behalf of Defendants, Dollar General Corporation and Dolgencorp, Inc. in connection with *Lanard Toys, Ltd. v. Dollar General Corporation, et al.,* May 7, 2009.

Presentations (2003-2013)

> Panelist and Expert Economist for Plaintiff at "Mock Trial," presented by *The Antitrust Law and Economics Institute*, Co-sponsored by American Bar Association Section on Antitrust, George Mason School of Law, Arlington, VA, October 9, 2013.

> Panelist, "Fundamentals-Antitrust Economics," presented by *The Economics Committee of the American Bar Association's Section of Antitrust Law,* American Bar Association Spring Meeting, Washington, DC, April 10, 2013.

> Panelist, "Presenting an Effective Damages Case in Light of Recent Federal Circuit Precedent," sponsored by *The Licensing Executives Society (U.S.A. and Canada), Inc. (LES Workshop),* San Diego, CA, October 19, 2011.

> Panelist, "The Fundamentals of Working with Economic Experts Committee Program," co-sponsored by *The ABA Section of Antitrust Law,* Teleconference, April 29, 2011.

> Panelist, "Princo v. ITC" Telebriefing sponsored by *Law Seminars International*, September 30, 2010.

> Panelist, "Patent Hold Up: When Does the Abuse of a Private Standard Setting Process Amount to Actionable Conduct Under Section 2 of the Sherman Act or Deception Under Section Under Section 5 of the FTC Act?," presented by *The Philadelphia Bar Association Antitrust Law Committee of the Business Law Section's CLE Program*, Philadelphia, PA, September 21, 2010.

> Panelist, "Antitrust and Innovation Symposium: Unilateral Conduct, Licensing and Innovation," co-sponsored by *The ABA Section of Antitrust Law and Stanford Law School,* Stanford, CA, May 21, 2010.

Lauren J. Stiroh

Panelist, "Taking and Defending Expert Deposition Testimony," co-sponsored by *The ABA Section of Antitrust Law, Economics and Trial Practices Committees*, April 21, 2010.

Panelist, "Antitrust Economics for Attorneys: The Economics of Innovation and Intellectual Property," presented by *The Economics and Intellectual Property Committees of the American Bar Association's Section of Antitrust Law*, Washington, D.C., July 23, 2008.

Panelist, "Comparables: The Use and Misuse of Benchmark Royalty Rates for Patent Damages," Intellectual Property Seminar Series, *NERA Economic Consulting*, New York, NY, January 2007.

Panelist, "Illinois Tool Works and Tying: Impact and Implications," *ABA-CLE,* Teleconference, May 19, 2006.

Panelist, "Antitrust Mock Trial," *presented by The Trial Practice Committee*, American Bar Association Annual Spring Meeting, Washington, D.C., March 30, 2006.

Speech, "Standard Setting, Network Effects and Market Power," *presented at Law Seminars International's Conference,* Atlanta, Georgia, October 8, 2004.

Speech, "The Relevant Market in Intellectual Property/Antitrust Litigation," *presented at the Practising Law Institute*, June 2004, June 2002 and June 2001.

Speech "The Economics of Damages in Intellectual Property Litigation," presented at Law Seminars International's workshop, Calculating and Proving Patent Damages, Stamford, Connecticut, May 14, 2004.

Publications (2003-2013)

"Considerations in Defining the Relevant Product Market for Antitrust Analysis", published as part of the course materials in connection with the 61st Spring Meeting of the Section of Antitrust Law, American Bar Association, *Fundamentals-Antitrust Economics*, April 10, 2013.

"FTC Requires Patentee to Fulfill Licensing Commitments To A Standard-Setting Organization To Prevent Consumer Harm" co-authored with Eugene L. Chang, Esq., William H. Rooney, Esq. and Heather M. Schneider, Esq., Willkie Farr & Gallagher, LLP, *The Metropolitan Corporate Counsel*, 2008.

Chapter 14: "Proving Causation in Damage Analyses" in Economics of Antitrust, Complex Issues in a Dynamic Economy, edited by Dr. Lawrence Wu, NERA Economic Consulting, 2007.

Lauren J. Stiroh

Co-editor, <u>Economic Approaches to Intellectual Property Policy, Litigation, and Management</u>. Edited by Dr. Gregory K. Leonard and Dr. Lauren J. Stiroh, NERA Economic Consulting, September 2005.

Chapter 1: "Uncertainty in the Economics of Knowledge and Information" in <u>Economic Approaches to Intellectual Property Policy, Litigation, and Management</u>, edited by Dr. Gregory K. Leonard and Dr. Lauren J. Stiroh, NERA Economic Consulting, 2005.

Chapter 3: "A Practical Guide to Damages" co-authored with Dr. Gregory K. Leonard, in <u>Economic Approaches to Intellectual Property Policy, Litigation, and Management</u>, edited by Dr. Gregory K. Leonard and Dr. Lauren J. Stiroh, NERA Economic Consulting, 2005.

Chapter 15: "Standard Setting and Market Power" co-authored with Dr. Richard T. Rapp in <u>Economic Approaches to Intellectual Property Policy, Litigation, and Management</u>, edited by Dr. Gregory K. Leonard and Dr. Lauren J. Stiroh, NERA Economic Consulting, 2005.

November 2013

Exhibit 2

Documents Relied Upon by Lauren J. Stiroh, Ph.D.

Court Filings

In Re: High-Tech Employee Antitrust Litigation, United States District Court Northern District of
California, Master Docket No. 5:11-CV-2509-LHK:

Consolidated Amended Complaint, September 2, 2011

Plaintiffs' Notice of Motion and Motion for Class Certification, and Memorandum of Law in
Support, October 1, 2012

Declaration of Steven Burmeister in Support of Defendants' Opposition to Plaintiffs' Motion
for Class Certification, November 12, 2012 and accompanying exhibits

Declaration of Chris Galy, in Support of Defendants' Opposition to Plaintiffs' Motion for
Class Certification, November 9, 2012 and accompanying exhibits

Declaration of Michelle Maupin in Support of Defendants' Opposition to Plaintiffs' Motion for
Class Certification, November 12, 2012 and accompanying exhibits

Declaration of Lori McAdams, in Support of Defendants' Opposition to Plaintiffs' Motion for
Class Certification November 12, 2012

Declaration of Danny McKell in Support of Opposition to Class Certification, November 12,
2012 and accompanying exhibits

Declaration of Donna Morris in Support of Defendants' Opposition to Plaintiffs' Motion for
Class Certification, November 9, 2012 and accompanying exhibits

Declaration of Mason Stubblefield in Support of Defendants' Opposition to Plaintiffs' Motion
for Class Certification, November 9, 2012 and accompanying exhibits

Declaration of Frank Wagner in Support of Defendants' Opposition to Plaintiffs' Motion for
Class Certification, November 9, 2012 and accompanying exhibits

Plaintiffs' Supplemental Motion and Brief in Support of Class Certification, May 10, 2013

Plaintiffs' Supplemental Answers and Objections to Defendants' Second Set of Interrogatories,
May 24, 2013

Order Granting Plaintiffs' Supplemental Motion for Class Certification, October 24, 2013

Order Granting Plaintiffs' Motion for Conditional Class Certification and Preliminary
Approval of Partial Class Action Settlements with Defendants Intuit Inc., Lucasfilm, Ltd.,

Exhibit 2

and Pixar, Approving Form and Manner of Notice, and Scheduling Final Approval Hearing, October 30, 2013.

Expert Reports

Expert Report of Edward E. Leamer, Ph.D., October 1, 2012 and accompanying production

Reply Expert Report of Edward E. Leamer, Ph.D., December 10, 2012 and accompanying production

Supplemental Expert Report of Edward E. Leamer, Ph.D., May 10, 2013 and accompanying production

Rebuttal Supplemental Expert Report of Edward E. Leamer, Ph.D., July 12, 2013 and accompanying production

Expert Report of Edward E. Leamer, Ph.D., October 28, 2013 and accompanying production

Expert Report of Professor Kevin Murphy, November 12, 2012 and accompanying production

Supplemental Expert Report of Kevin Murphy, June 21, 2013 and accompanying production

Depositions

Deposition of Rosemary Arriada-Keiper, Director of Rewards at Adobe Systems, Inc., March 28, 2013

Deposition of Mark Bentley, Executive Recruiter at Apple, August 23, 2012

Deposition of Mark Fichtner, former Software Engineer at Intel, October 15, 2012.

Deposition of Siddharth Hariharan, former Software Engineer at Lucasfilm, October 12, 2012.

Deposition of Edward Leamer, Opposing Expert, Volume I, October 26, 2012 and accompanying exhibits

Deposition of Edward Leamer, Opposing Expert, Volume II, June 11, 2013 and accompanying exhibits

Deposition of Edward Leamer, Opposing Expert, Volume III, November 18, 2013 and accompanying exhibits

Deposition of Danny McKell, Compensation and Benefits Specialist at Intel, March 20, 2013

Exhibit 2

Deposition of Donna Morris, Senior Vice President of Global Human Resources at Adobe, August 21, 2012

Deposition of James Morris, General Manager and Executive Vice President of Production at Pixar, August 3, 2012

Deposition of Daniel Stover, former Software Engineer at Intuit, October 29, 2012.

Deposition of Paul Ottellini, former Chief Executive Officer at Intel, January 29, 2013

Deposition of John Schirm, Compensation Manager at Google, June 29, 2012

Deposition of Stephanie Sheehy, Manager of Human Resources Analysis at Pixar, March 5, 2013

Deposition of Frank Wagner, Director of Compensation at Google, March 7, 2013

Bates Stamped Documents

231APPLE001164 – 5

231APPLE021322 – 34

231APPLE032332

231APPLE021331

231APPLE002151 – 2

231APPLE021330

231APPLE080776 – 7

231APPLE094041 – 67

231APPLE095044 – 63

76526DOC000003 – 5

76526DOC000007

76526DOC000011 – 4

76582DOC000783_000016-20

76583DOC002007_000019

76583DOC007683 – 725

76603DOC000001 – 13

76614DOC022664 – 92

76616DOC005993 – 6000

76633DOC004093 – 4118

76635DOC000021 – 24

76650DOC000014 – 95

76658DOC000895 – 960

ADOBE_001096 – 7

ADOBE_005950 – 67

ADOBE_007186 – 7

ADOBE_007690

ADOBE_008623

ADOBE_009493 – 4

ADOBE_013339 – 40

ADOBE_014769 – 78

ADOBE_015024

ADOBE_015405

ADOBE_015059

ADOBE_015840

ADOBE_018730

ADOBE_023747

GOOG-HIGH-TECH-00000107 – 9

GOOG-HIGH-TECH-00007715 – 8

Highly Confidential – Attorneys' Eyes Only   Exhibit 2

GOOG-HIGH-TECH-00007731 – 2	GOOG-HIGH-TECH-00195512	INTUIT_038565
GOOG-HIGH-TECH-00008283 – 4	GOOG-HIGH-TECH-00195943	INTUIT_038812
GOOG-HIGH-TECH-00009764	GOOG-HIGH-TECH-00255218.000001 – 16	LUCAS00013507
GOOG-HIGH-TECH-00023500 – 601	GOOG-HIGH-TECH-00302552.000001 – 13	LUCAS00018779 – 807
GOOG-HIGH-TECH-00056790	GOOG-HIGH-TECH-00450451	LUCAS00188922 – 9
GOOG-HIGH-TECH-00057190	GOOG-HIGH-TECH-00519070.R – 80.R	PIX00000400
GOOG-HIGH-TECH-00058864	GOOG-HIGH-TECH-00519081 – 91	PIX00002210
GOOG-HIGH-TECH-00194962	GOOG-HIGH-TECH-0057190	PIX00003419
		PIX00006025
		PIX00009070 – 4
		PIX00009089 – 92
		PIX00009180

Other Production Documents

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Exhibit III.1

Adobe Technical, Creative and R&D Employees 2001 to 2011

Notes: Employee counts include all Technical, Creative and R&D employees who were employed by the Defendant at any point during the calendar year. Numbers above reflect annual totals and are not a continuous series.

Source: Dr. Leamer Merits Backup.

NERA Economic Consulting

Exhibit III.2

Total Compensation to Adobe
Technical, Creative and R&D Employees
2001 to 2011

Total Compensation (in millions of dollars)

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.3

Average Compensation to Adobe
Technical, Creative and R&D Employees
2001 to 2011

Average Compensation (in dollars)

$250,000
$200,000
$150,000
$100,000
$50,000
$0

2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
    The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.4

Average Base Salary to Adobe
Technical, Creative and R&D Employees
2001 to 2011

Average Base Salary (in dollars)

| $140,000 |
| $120,000 |
| $100,000 |
| $80,000 |
| $60,000 |
| $40,000 |
| $20,000 |
| $0 |

Year

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.5

Average Bonus to Adobe
Technical, Creative and R&D Employees
2001 to 2011

Average Bonus (in dollars)

$25,000

$20,000

$15,000

$10,000

$5,000

$0

2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.6

Average Cash Compensation to Adobe
Technical, Creative and R&D Employees
2001 to 2011

Average Cash Compensation (in dollars)

$180,000
$160,000
$140,000
$120,000
$100,000
$80,000
$60,000
$40,000
$20,000
$0

2001   2002   2003   2004   2005   2006   2007   2008   2009   2010   2011

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.7

Average Value of Equity Awards by Type to Adobe Technical, Creative and R&D Employees 2001 to 2011

Average Value of Equity Awards (in dollars)

$80,000
$70,000
$60,000
$50,000
$40,000
$30,000
$20,000
$10,000
$0

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Year

RSU Value   Stock Option Value

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year. The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.8

Average Value of Equity Awards to Adobe Technical, Creative and R&D Employees 2001 to 2011

Average Value of Equity Awards (in dollars)

$80,000
$70,000
$60,000
$50,000
$40,000
$30,000
$20,000
$10,000
$0

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.9

Apple Technical, Creative and R&D Employees
2001 to 2011

Number of Employees

9,000
8,000
7,000
6,000
5,000
4,000
3,000
2,000
1,000
0

2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011

Year

Notes: Employee counts include all Technical, Creative and R&D employees who were employed by the Defendant at any point during the calendar year.
Numbers above reflect annual totals and are not a continuous series.
Source: Dr. Leamer Merits Backup.

NERA Economic Consulting

Exhibit III.10

Total Compensation to Apple
Technical, Creative and R&D Employees
2001 to 2011

Total Compensation (in millions of dollars)

Year

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.11

Average Compensation to Apple
Technical, Creative and R&D Employees
2001 to 2011

Average Compensation (in dollars)

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.12

Average Base Salary to Apple
Technical, Creative and R&D Employees
2001 to 2011

Average Base Salary to (in dollars)

Year

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.13

Average Bonus to Apple
Technical, Creative and R&D Employees
2001 to 2011

Average Bonus (in dollars)

Year

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.14

**Average Cash Compensation to Apple
Technical, Creative and R&D Employees
2001 to 2011**

Average Cash Compensation (in dollars)

Year

2001   2002   2003   2004   2005   2006   2007   2008   2009   2010   2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
   The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.15

Average Value of Equity Awards by Type to Apple Technical, Creative and R&D Employees 2001 to 2011

Year

Average Value of Equity Awards (in dollars)

RSU Value   Stock Option Value

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Average Value of Equity Awards to Apple Technical, Creative and R&D Employees 2001 to 2011

Average Value of Equity Awards (in dollars)

Year

2001   2002   2003   2004   2005   2006   2007   2008   2009   2010   2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.17

Google Technical, Creative and R&D Employees
2001 to 2011

Number of Employees

Notes: Employee counts include all Technical, Creative and R&D employees who were employed by the Defendant at any point during the calendar year.
Numbers above reflect annual totals and are not a continuous series.

Source: Dr. Leamer Merits Backup.

NERA Economic Consulting

Exhibit III.18

Total Compensation to Google
Technical, Creative and R&D Employees
2001 to 2011

Total Compensation (in millions of dollars)

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
   The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.19

**Average Compensation to Google
Technical, Creative and R&D Employees
2001 to 2011**

Average Compensation (in dollars)

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
      The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.20

Average Base Salary to Google
Technical, Creative and R&D Employees

Average Base Salary (in dollars)

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.21

Average Bonus to Google
Technical, Creative and R&D Employees

Average Bonus (in dollars)

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.22

Average Cash Compensation to Google Technical, Creative and R&D Employees 2001 to 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year. The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.23

Average Value of Equity Awards by Type to Google Technical, Creative and R&D Employees 2001 to 2011

Average Value of Equity Awards (in dollars)

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.24

Average Value of Equity Awards to Google Technical, Creative and R&D Employees 2001 to 2011

Average Value of Equity Awards (in dollars)

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year. The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.25

Intel Technical, Creative and R&D Employees

Notes: Employee counts include all Technical, Creative and R&D employees who were employed by the Defendant at any point during the calendar year. Numbers above reflect annual totals and are not a continuous series.

Source: Dr. Leamer Merits Backup.

NERA Economic Consulting

Exhibit III.26

Total Compensation to Intel
Technical, Creative and R&D Employees
2001 to 2011

Total Compensation (in millions of dollars)

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.27

Highly Confidential – Attorneys' Eyes Only

**Average Compensation to Intel
Technical, Creative and R&D Employees
2001 to 2011**

Average Compensation (in dollars)

Note   The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.28

**Average Base Salary to Intel
Technical, Creative and R&D Employees
2001 to 2011**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.29

**Average Bonus to Intel
Technical, Creative and R&D Employees
2001 to 2011**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
       The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.30

**Average Cash Compensation to Intel
Technical, Creative and R&D Employees
2001 to 2011**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.31

Average Value of Equity Awards by Type to Intel Technical, Creative and R&D Employees

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year. The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.32

**Average Value of Equity Awards to Intel
Technical, Creative and R&D Employees
2001 to 2011**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.33

**Intuit Technical, Creative and R&D Employees
2001 to 2011**

Number of Employees

Notes: Employee counts include all Technical, Creative and R&D employees who were employed by the Defendant at any point during the calendar year.
   Numbers above reflect annual totals and are not a continuous series.

Source: Dr. Leamer's Merits Backup.

NERA Economic Consulting

Exhibit III.34

**Total Compensation to Intuit
Technical, Creative and R&D Employees
2001 to 2011**

Total Compensation (in millions of dollars)

Year

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.35

**Average Compensation to Intuit
Technical, Creative and R&D Employees
2001 to 2011**

Average Compensation (in dollars)

Year

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.36

Highly Confidential – Attorneys' Eyes Only

Average Base Salary to Intuit
Technical, Creative and R&D Employees
2001 to 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
    The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.37

Average Bonus to Intuit
Technical, Creative and R&D Employees

Year

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.38

Average Cash Compensation to Intuit
Technical, Creative and R&D Employees

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.39

Highly Confidential – Attorneys' Eyes Only

Average Value of Equity Awards by Type to Intuit Technical, Creative and R&D Employees

Year

RSU Value   Stock Option Value

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.40

Average Value of Equity Awards to Intuit Technical, Creative and R&D Employees 2001 to 2011

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.41

Lucasfilm Technical, Creative and R&D Employees
2001 to 2011

Notes: Employee counts include all Technical, Creative and R&D employees who were employed by the Defendant at any point during the calendar year.
 Numbers above reflect annual totals and are not a continuous series.

Source: Dr. Leamer's Merits Backup.

NERA Economic Consulting

Exhibit III.42

Total Compensation to Lucasfilm
Technical, Creative and R&D Employees

Year

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
      The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.43

Highly Confidential – Attorneys' Eyes Only

**Average Compensation to Lucasfilm
Technical, Creative and R&D Employees
2001 to 2011**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
    The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.44

Average Base Salary to Lucasfilm
Technical, Creative and R&D Employees

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
    The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.45

**Average Bonus to Lucasfilm
Technical, Creative and R&D Employees
2001 to 2011**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
   The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.46

Pixar Technical, Creative and R&D Employees
2001 to 2011

Notes: Employee counts include all Technical, Creative and R&D employees who were employed by the Defendant at any point during the calendar year.
Numbers above reflect annual totals and are not a continuous series.
Source: Dr. Leamer's Merits Backup.

NERA Economic Consulting

Exhibit III.47

Total Compensation to Pixar
Technical, Creative and R&D Employees
2001 to 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
  The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.48

Average Compensation to Pixar
Technical, Creative and R&D Employees

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
       The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.49

Average Base Salary to Pixar
Technical, Creative and R&D Employees

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.50

**Average Bonus to Pixar
Technical, Creative and R&D Employees**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.51

Highly Confidential – Attorneys' Eyes Only

Average Cash Compensation to Pixar
Technical, Creative and R&D Employees

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.52

Average Value of Equity Awards by Type to Pixar Technical, Creative and R&D Employees 2001 to 2011

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year. The data are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.53

**Average Value of Equity Awards to Pixar
Technical, Creative and R&D Employees
2001 to 2011**

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer who were employed by the Defendant in the given year.
    The data are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit III.54

Average Total Nominal Compensation by Defendant and Year
Technical, Creative and R&D Employees
2001 to 2011

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
				----(Dollars)----			
2001	$ 169,626				$ 147,710		
2002	142,318				106,782		
2003	132,289				118,711		
2004	135,770				126,066		
2005	137,360				129,901		
2006	148,155				147,271		
2007	169,977				149,632		
2008	173,328				159,552		
2009	173,310				157,467		
2010	167,365				176,319		
2011	191,463				174,634		

Note:

Data include employees identified as technical, creative and R&D by Dr. Leamer.

Source:

Dr. Leamer Merits Backup.

NERA Economic Consulting

Exhibit III.55

Annual Average Percent Change in Total Compensation by Defendant and Year
Technical, Creative and R&D Employees
2002 to 2011

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar
				(Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
2002	(20.6) %				(22.6) %	11.2 %	8.6 %
2003	4.4				10.3	11.0	24.3
2004	2.2				7.6	(1.0)	(20.5)
2005	12.1				4.5	7.0	43.4
2006	8.4				15.2	11.8	23.8
2007	15.0				9.8	5.4	3.9
2008	7.7				12.3	7.6	0.8
2009	(6.5)				0.3	(0.7)	(9.0)
2010	5.6				15.3	3.8	13.6
2011	13.5				2.5	3.9	13.1

Notes: Data include employees identified as technical, creative and R&D by Dr. Leamer.
Percents listed are the average change in total compensation from the prior year.

Source: Dr. Leamer's regression data.

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Exhibit IV.1

Previous Employers of Five or More Hires
Adobe
2001 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Adobe
2001 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Adobe
2001 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Adobe
2001 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)
Total		**5,409**	**100.0 %**
	All Defendants Excluding Adobe	122	2.3 %
	Number of Firms Supplying Employees	2,383	

Notes:

This list covers the former employers of all Adobe employees.

Hires through acquisitions are excluded.

The periods analyzed depend on the avaiablity of company data.

Due to differences in firm naming conventions, the number of firms may be overstated.

Source:

Dr. Murphy Backup.

NERA Economic Consulting

Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			--(Percent)--
(a)	**(b)**	**(c)**	**(d)**

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Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
(a)	**(b)**	**(c)**	**--(Percent)--** **(d)**

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Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			--(Percent)--
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			--(Percent)--
(a)	**(b)**	**(c)**	**(d)**

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Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			--(Percent)--
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			--(Percent)--
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
(a)	(b)	(c)	--(Percent)-- (d)
Total		**13,636**	**100.0 %**
	All Defendants Excluding Apple	247	1.8 %
	Number of Firms Supplying Employees	4,524	

Notes:

This list covers the former employers of all Apple employees.
Hires through acquisitions are excluded.
The periods analyzed depend on the avaiablity of company data.
Due to differences in firm naming conventions, the number of firms may
 be overstated.

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Exhibit IV.1

Previous Employers of Five or More Hires
Apple
2006Q3 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires --(Percent)--
(a)	**(b)**	**(c)**	**(d)**

Source:

Dr. Murphy Backup.

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires
(a)	(b)	(c)	---(Percent)--- (d)
	GOOGLE		

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	**(b)**	**(c)**	**(d)**

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	**(b)**	**(c)**	**(d)**

Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	**(b)**	**(c)**	**(d)**

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	**(b)**	**(c)**	**(d)**

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Google
2005 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

Notes:
This list covers the former employers of all Google employees.
Hires through acquisitions are excluded.
The periods analyzed depend on the avaiablity of company data.
Due to differences in firm naming conventions, the number of firms may be overstated.

Source:
Dr. Murphy Backup.

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Exhibit IV.1

Previous Employers of Five or More Hires
Intel
2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Intel
2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires --(Percent)--
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires

Intel

2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Intel
2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Intel
2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires
Intel
2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	(b)	(c)	(d)

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Exhibit IV.1

Previous Employers of Five or More Hires

Intel

2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

Exhibit IV.1

Previous Employers of Five or More Hires
Intel
2007 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)

Notes:

This list covers the former employers of all Intel employees.

Hires through acquisitions are excluded.

The periods analyzed depend on the avaiablity of company data.

Due to differences in firm naming conventions, the number of firms may be overstated.

Source:

Dr. Murphy Backup.

NERA Economic Consulting

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Exhibit IV.1

Previous Employers of Five or More Hires
Intuit
2006 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	**(b)**	**(c)**	**(d)**
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			

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Exhibit IV.1

Previous Employers of Five or More Hires

Intuit

2006 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
(a)			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
32			
33			
34			
35			
36			
37			
38			
39			
40			
41			
42			
43			
44			

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Exhibit IV.1

Previous Employers of Five or More Hires
Intuit
2006 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	(b)	(c)	(d)

Notes:

This list covers the former employers of all Intuit employees.
Hires through acquisitions are excluded.
The periods analyzed depend on the avaiablity of company data.

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Exhibit IV.1

Previous Employers of Five or More Hires

Intuit

2006 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	(b)	(c)	(d)

Due to differences in firm naming conventions, the number of firms may be overstated.

Source:

Dr. Murphy Backup.

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Exhibit IV.1

Previous Employers of Two or More Hires
Lucasfilm
2008Q2 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires
(a)	**(b)**	**(c)**	---(Percent)--- **(d)**
	LUCASFILM	26	7.1 %

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Exhibit IV.1

Previous Employers of Two or More Hires
Lucasfilm
2008Q2 to 2012Q1

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	(b)	(c)	(d)
		7	1.9 %

All Defendants Excluding Lucasfilm

Number of Firms Supplying Employees   204

Notes: This list covers the former employers of all Lucasfilm employees.
Hires through acquisitions are excluded.
The periods analyzed depend on the avaiablity of company data.
Due to differences in firm naming conventions, the number of firms may be overstated.

Source:

Dr. Murphy Backup.

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Exhibit IV.1

Previous Employers of Two or More Hires
Pixar
2001 to 2012Q2

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Exhibit IV.1

Previous Employers of Two or More Hires
Pixar
2001 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires
			---(Percent)---
(a)	(b)	(c)	(d)

All Defendants Excluding Pixar   40   4.6 %

Number of Firms Supplying Employees   311

Notes:

This list covers the former employers of all Pixar employees.
Hires through acquisitions are excluded.
The periods analyzed depend on the avaiablity of company data.

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Exhibit IV.1

Previous Employers of Two or More Hires
Pixar
2001 to 2012Q2

Rank	Previous Employer	Hires	Percent of Total Hires ---(Percent)---
(a)	**(b)**	**(c)**	**(d)**

Due to differences in firm naming conventions, the number of firms may
be overstated.

Source:

Dr. Murphy Backup.

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Exhibit IV.2

Count and Percent of New Hires from Defendants With and Without a DNCC Agreement
Pre-conduct, Conduct, and Post-conduct Periods
Technical, Creative and R&D Employees

	Count		Percent	
Period	From DNCC Agreement Firms	From Non-DNCC Agreement Firms	From DNCC Agreement Firms	From Non-DNCC Agreement Firms
(a)	(b)	(c)	(d)	(e)
Pre-conduct	30	14,609	0.2 %	99.8 %
Conduct	145	22,975	0.6	99.4
Post-conduct	134	16,499	0.8	99.2
Total	309	54,083	0.6 %	99.4 %

Notes:

Employee counts are based on the number of employees identified as technical, creative and R&D employees
in Dr. Leamer's regression data.

New hires do not include acquisitions.

The conduct periods are defined as described in Figure 1 of Dr. Leamer's Class Certification Report.

The conduct period starts in January 2001 for Lucasfilm and Pixar, February 2005 for Apple and Google, March 2005 for Intel,
May 2005 for Adobe, and June 2007 for Intuit and ends After March 2009. The pre-conduct period for each Defendant is
from 2001 to the aforementioned dates. The post-conduct period starts after March 2009 and goes through 2011.

Adobe has a DNCC agreement with Apple.

Apple has DNCC agreements with Adobe, Google, and Pixar.

Google has DNCC agreements with Apple, Intel, and Intuit.

Intel has a DNCC agreement with Google.

Intuit has a DNCC agreement with Google.

Lucasfilm has a DNCC agreement with Pixar.

Sources:

Dr. Leamer Class Certification Backup.

Dr. Leamer Merits Backup.

NERA Economic Consulting

Exhibit IV.3

Count of New Hires by Defendant and Year
Technical, Creative and R&D Employees
2001 to 2011

Year (a)	Adobe (b)	Apple (c)	Google (d)	Intel (e)	Intuit (f)	Lucasfilm (g)	Pixar (h)	All Defendants (i) Σ (b):(h)
2001	180	481	45	■	297	■	■	3,071
2002	99	329	109	■	327	■	■	1,551
2003	105	279	292	■	224	■	■	1,369
2004	176	330	523	■	246	■	■	2,734
2005	159	644	1,195	■	331	■	■	5,983
2006	287	572	1,397	■	356	■	■	4,224
2007	241	730	1,547	■	416	■	■	3,771
2008	218	823	1,187	■	317	■	■	3,990
2009	90	772	537	■	140	■	■	2,086
2010	265	1,206	1,972	■	227	■	■	5,025
2011	274	1,471	2,549	■	296	■	■	7,212
Total	2,094	7,637	11,353	■	3,177	■	■	41,016

Notes: Employee counts are based on the number of employees identified as technical, creative and R&D employees
in Dr. Leamer's regression data.
New hires do not include acquisitions.
New hire counts do not include rehires.

Source: Dr. Leamer Merits Backup.

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Exhibit IV.4

New Hires as a Percentage of Current Year's Employment in Class By Defendant
Pre-conduct, Conduct, and Post-conduct Periods
Technical, Creative and R&D Employees

Period	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
				(Percent)			
Pre-conduct	8.5 %	11.4 %	50.4 %	███	14.8 %	n/a %	n/a %
Conduct	8.8	15.0	31.8		12.0	16.3	12.3
Post-conduct	7.5	16.7	18.1		8.5	8.7	7.3

Notes:

Employee counts are based on the number of employees identified as technical, creative and R&D employees
in Dr. Leamer's regression data.
New hires do not include acquisitions.
The conduct periods are defined as described in Figure 1 of Dr. Leamer's Class Certification Report.
The conduct period starts in January 2001 for Lucasfilm and Pixar, February 2005 for Apple and Google, March
2005 for Intel, May 2005 for Adobe, and June 2007 for Intuit and ends After March 2009. The pre-conduct
period for each Defendant is from 2001 to the aforementioned dates. The post-conduct period starts after
March 2009 and goes through 2011.

Sources:

Dr. Leamer Class Certification Backup.
Dr. Leamer Merits Backup.

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Exhibit IV.5

Count and Percent of Employees Lost from a Defendant to a DNCC Firm
Pre-conduct, Conduct, and Post-conduct Periods
Technical, Creative and R&D Employees

	Pre-conduct		Conduct		Post-conduct	
	Employees Lost ---(Count)---	Employees Lost as a Percent of All Employees ------------(Percent)------------	Employees Lost ---(Count)---	Employees Lost as a Percent of All Employees ------------(Percent)------------	Employees Lost ---(Count)---	Employees Lost as a Percent of All Employees ------------(Percent)------------
Defendant						
(a)	(b)	(c)	(d)	(e)	(f)	(g)
Adobe	11	0.15 %	26	0.26 %	27	0.34 %
Apple	19	0.15	46	0.24	43	0.22
Google	0	0.00	6	0.02	14	0.06
Intel	4	0.03	1	0.02	10	0.14
Intuit	n/a	n/a	2	0.06	3	0.26
Lucasfilm	n/a	n/a	8	0.18	2	0.09
Pixar						

Notes:

Employee counts are based on the number of employees identified as technical, creative and R&D employees
  in Dr. Leamer's regression data.

The conduct periods are defined as described in Figure 1 of Dr. Leamer's Class Certification Report.

The conduct period starts in January 2001 for Lucasfilm and Pixar, February 2005 for Apple and Google, March 2005 for Intel,
  May 2005 for Adobe, and June 2007 for Intuit and ends After March 2009. The pre-conduct period for each Defendant is
  from 2001 to the aforementioned dates. The post-conduct period starts after March 2009 and goes through 2011.

Adobe has a DNCC agreement with Apple.
Apple has DNCC agreements with Adobe, Google, and Pixar.
Google has DNCC agreements with Apple, Intel, and Intuit.
Intel has a DNCC agreement with Google.
Intuit has a DNCC agreement with Google.
Lucasfilm has a DNCC agreement with Pixar.

Sources:

Dr. Leamer Class Certification Backup.
Dr. Leamer Merits Backup.

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Exhibit IV.6

R-Squareds in Dr. Leamer's "Compensation Structure" Regressions
Are Predominantly Attributable to Employer and Job Indicators
2001 to 2011

Year	R-Squareds Using Dr. Leamer's Methodology in his Figure 13	Including Only Employer and Job Indicators	Excluding Employer and Job Indicators
(a)	(b)	(c)	(d)
		------(Percent)------	
2001	89 %	89 %	15 %
2002	89	88	16
2003	88	88	16
2004	88	87	18
2005	88	87	16
2006	87	87	19
2007	85	84	17
2008	86	86	19
2009	88	88	17
2010	84	84	18
2011	88	87	21

Source: Dr. Leamer's regression data.

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Exhibit IV.7

Base Salary Growth of 16 Similarly Situated Apple Employees
2007, Apple "SW_DEVELOP_ENG_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Base Salary
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			---(Dollars)---			[(f) - (b)]	[(g) / (b)]	Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Employee 9								
Employee 10								
Employee 11								
Employee 12								
Employee 13								
Employee 14								
Employee 15								
Employee 16								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source:

Dr. Leamer's regression data.

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Exhibit IV.8

Base Salary Growth of 34 Similarly Situated Google Employees
2007, Google "SOFTWARE_ENGINEER_III," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Base Salary
			--(Dollars)--				-(Percent)-	--(Dollars)---
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Employee 9								
Employee 10								
Employee 11								
Employee 12								
Employee 13								
Employee 14								
Employee 15								
Employee 16								
Employee 17								
Employee 18								
Employee 19								
Employee 20								
Employee 21								
Employee 22								
Employee 23								
Employee 24								
Employee 25								
Employee 26								
Employee 27								
Employee 28								
Employee 29								
Employee 30								
Employee 31								
Employee 32								
Employee 33								
Employee 34								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source:

Dr. Learner's regression data.

NERA Economic Consulting

Exhibit IV.9

Base Salary Growth of 21 Similarly Situated Intel Employees

2007, Intel "COMPONENT_DESIGN_ENGR_3," Male, Tenure of Less Than 2 Years, Aged 23-24

2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Base Salary
	-----		-----(Dollars)-----			-(Dollars)-	-(Percent)-	---(Dollars)---
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
						[(f) - (b)]	[(g) / (b)]	Σ(a):(f)

Employee 1
Employee 2
Employee 3
Employee 4
Employee 5
Employee 6
Employee 7
Employee 8
Employee 9
Employee 10
Employee 11
Employee 12
Employee 13
Employee 14
Employee 15
Employee 16
Employee 17
Employee 18
Employee 19
Employee 20
Employee 21

Minimum
Maximum
Dollar Range
Dollar Range Percent

Source:

Dr. Learner's regression data.

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Exhibit IV.10

Base Salary Growth of 8 Similarly Situated Adobe Employees
2007, Adobe "MTS_SOFTWARE_DEV_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Base Salary
			-------(Dollars)-------				-(Percent)-	--(Dollars)---
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
						[(f) - (b)]	[(g) / (b)]	Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.11

Total Compensation Growth of 16 Similarly Situated Apple Employees
2007, Apple "SW_DEVELOP_ENG_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Compensation
	----------------------------(Dollars)----------------------------					-(Dollars)-	-(Percent)-	----(Dollars)----
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Employee 9								
Employee 10								
Employee 11								
Employee 12								
Employee 13								
Employee 14								
Employee 15								
Employee 16								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source:

Dr. Leamer's regression data.

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Exhibit IV.12

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Total Compensation Growth of 34 Similarly Situated Google Employees
2007, Google "SOFTWARE_ENGINEER_III," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Compensation
				-----(Dollars)-----			-----(Percent)-----	-----(Dollars)-----
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Employee 9								
Employee 10								
Employee 11								
Employee 12								
Employee 13								
Employee 14								
Employee 15								
Employee 16								
Employee 17								
Employee 18								
Employee 19								
Employee 20								
Employee 21								
Employee 22								
Employee 23								
Employee 24								
Employee 25								
Employee 26								
Employee 27								
Employee 28								
Employee 29								
Employee 30								
Employee 31								
Employee 32								
Employee 33								
Employee 34								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.13

Total Compensation Growth of 21 Similarly Situated Intel Employees
2007, Intel "COMPONENT_DESIGN_ENGR_3," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Compensation
			----(Dollars)----			----(Dollars)----	-(Percent)-	----(Dollars)----
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Employee 9								
Employee 10								
Employee 11								
Employee 12								
Employee 13								
Employee 14								
Employee 15								
Employee 16								
Employee 17								
Employee 18								
Employee 19								
Employee 20								
Employee 21								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source:
Dr. Leamer's regression data.

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Exhibit IV.14

Total Compensation Growth of 8 Similarly Situated Adobe Employees
2007, Adobe "MTS_SOFTWARE_DEV_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Compensation
	-----------------------------------(Dollars)-----------------------------------					-------------	--(Percent)--	-----(Dollars)-----
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source: Dr. Learner's regression data.

NERA Economic Consulting

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title	Number of Employees	Change from Previous Year		(Percent)		
			----(Count)----		----	----	----	----
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2001		152					
ADOBE	2002		121	-31	-56.6	-24.7	-11.7	50.8
ADOBE	2003		113	-8	-28.3	-1.5	16.5	39.1
ADOBE	2004		122	9	-30.8	-10.9	3.3	25.5
ADOBE	2005		188	66	-20.7	7.4	19.5	45.1
ADOBE	2006		158	-30	-22.1	-7.2	7.6	50.0
ADOBE	2007		214	56	-18.2	-0.5	21.0	221.4
ADOBE	2008		219	5	-38.8	-6.0	21.3	52.3
ADOBE	2009		256	37	-48.2	-19.3	-4.8	32.9
ADOBE	2010		244	-12	-35.5	-1.8	9.7	57.2
ADOBE	2011		254	10	-29.6	0.4	9.9	47.8
ADOBE	2001		155					
ADOBE	2002		130	-25	-50.0	-28.5	-10.1	63.9
ADOBE	2003		121	-9	-33.5	-1.1	15.0	46.1
ADOBE	2004		127	6	-28.0	-13.8	1.3	35.4
ADOBE	2005		171	44	-19.5	3.7	17.0	41.4
ADOBE	2006		174	3	-32.2	-7.5	8.6	37.6
ADOBE	2007		204	30	-27.8	-0.6	20.8	257.5
ADOBE	2008		235	31	-36.4	-7.8	13.0	77.1
ADOBE	2009		252	17	-60.1	-18.3	-4.0	35.8
ADOBE	2010		262	10	-62.0	-6.0	11.2	47.2
ADOBE	2011		264	2	-47.5	-1.4	11.0	48.0
ADOBE	2001		20					
ADOBE	2002		20	0	-49.4	-44.1	0.5	10.7
ADOBE	2003		23	3	-53.9	-40.2	-11.0	8.1
ADOBE	2004		23	0	-24.5	6.7	57.3	79.3
ADOBE	2005		35	12	-34.9	-14.5	17.7	71.5
ADOBE	2006		26	-9	-26.8	4.6	51.8	112.2
ADOBE	2007		33	7	-24.0	2.2	24.7	81.6
ADOBE	2008		32	-1	-49.4	17.5	48.4	144.2
ADOBE	2009		33	1	-43.8	-17.0	3.2	107.1
ADOBE	2010		33	0	-57.2	-27.9	11.3	25.9
ADOBE	2011		33	0	7.4	28.2	59.9	176.5
ADOBE	2007		27					
ADOBE	2008		23	-4	-6.1	6.8	14.8	20.1
ADOBE	2009		31	8	-13.2	-7.8	-0.9	6.7
ADOBE	2010		27	-4	-9.3	-1.8	10.7	22.4

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			---(Count)---		------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2011		32	5	-10.1	-7.2	17.4	27.6
ADOBE	2007		62					
ADOBE	2008		62	0	-21.3	-2.3	9.6	31.8
ADOBE	2009		80	18	-19.7	-7.2	-1.2	13.3
ADOBE	2010		98	18	-20.0	3.0	18.4	41.9
ADOBE	2011		95	-3	-26.9	-13.5	16.4	39.6
ADOBE	2007		79					
ADOBE	2008		99	20	-12.7	-3.0	9.5	33.6
ADOBE	2009		110	11	-17.7	-10.6	-0.3	25.2
ADOBE	2010		125	15	-14.8	2.9	14.7	41.0
ADOBE	2011		169	44	-26.8	-2.8	15.1	40.6
ADOBE	2007		22					
ADOBE	2008		25	3	-17.3	-9.8	9.8	23.1
ADOBE	2009		37	12	-21.6	-4.4	1.8	29.5
ADOBE	2010		45	8	-48.2	0.1	13.1	35.0
ADOBE	2011		50	5	-31.1	-8.8	10.7	37.9
ADOBE	2001		33					
ADOBE	2002		31	-2	-51.4	-30.2	-17.3	72.5
ADOBE	2003		27	-4	-12.8	3.2	19.7	51.7
ADOBE	2004		30	3	-22.9	-3.8	11.3	23.4
ADOBE	2005		35	5	-6.3	12.3	21.7	32.5
ADOBE	2006		39	4	-11.2	-6.7	9.5	33.2
ADOBE	2007		34	-5	-10.9	1.3	34.0	59.5
ADOBE	2008		40	6	-27.5	-6.0	9.9	30.1
ADOBE	2009		37	-3	-30.7	-17.2	-7.4	9.4
ADOBE	2010		28	-9	-10.7	0.4	12.1	39.6
ADOBE	2011		19	-9	-10.1	-8.4	7.2	26.5
ADOBE	2001		11					
ADOBE	2002		9	-2	-39.2	-32.0	-18.3	-1.1
ADOBE	2003		19	10	-19.4	-14.1	9.4	32.4
ADOBE	2004		22	3	-5.2	1.8	18.1	39.3
ADOBE	2005		25	3	-3.0	6.8	13.4	65.4
ADOBE	2006		25	0	-19.1	-3.7	10.4	48.2
ADOBE	2007		17	-8	-6.2	6.1	12.8	25.9
ADOBE	2008		18	1	-2.0	2.6	19.1	30.5

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			---(Count)---			---(Percent)---		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2009		30	12	-21.4	-17.4	-4.9	4.7
ADOBE	2010		30	0	-19.8	-9.5	9.7	105.4
ADOBE	2011		28	-2	-33.2	7.2	32.4	63.1
ADOBE	2001		2					
ADOBE	2002		5	3	-50.7	-50.7	-19.1	-19.1
ADOBE	2003		11	6	-19.1	-16.3	11.1	27.6
ADOBE	2004		10	-1	-20.5	5.0	22.9	29.1
ADOBE	2005		12	2	-8.8	3.3	14.4	22.4
ADOBE	2006		15	3	-5.8	-2.3	11.0	49.4
ADOBE	2007		16	1	5.3	11.0	16.5	19.0
ADOBE	2008		16	0	-6.9	2.1	10.6	16.3
ADOBE	2009		25	9	-27.9	-13.7	-5.0	3.9
ADOBE	2010		29	4	-53.0	-14.8	4.4	25.1
ADOBE	2011		29	0	-19.9	21.8	40.3	68.1
ADOBE	2001		2					
ADOBE	2002		3	1	-29.3	-29.3	-4.0	-4.0
ADOBE	2003		4	1	-21.4	-21.4	-10.1	-10.1
ADOBE	2004		6	2	-8.5	-0.4	22.2	24.7
ADOBE	2005		10	4	4.2	10.6	17.1	53.4
ADOBE	2006		10	0	-16.4	-5.1	8.7	61.6
ADOBE	2007		14	4	-4.3	7.7	17.2	45.2
ADOBE	2008		17	3	-9.3	5.0	14.9	16.8
ADOBE	2009		24	7	-37.8	-24.4	-6.9	3.5
ADOBE	2010		28	4	-39.7	-7.6	9.3	37.7
ADOBE	2011		34	6	-29.9	25.4	45.8	75.0
ADOBE	2001		34					
ADOBE	2002		29	-5	-60.2	-40.0	-18.7	12.3
ADOBE	2003		24	-5	-42.4	-28.5	6.0	29.4
ADOBE	2004		22	-2	-13.3	1.9	21.7	45.4
ADOBE	2005		32	10	-12.9	-4.3	13.9	20.1
ADOBE	2006		23	-9	-20.2	-2.1	27.6	39.8
ADOBE	2007		24	1	-3.6	6.4	22.9	39.1
ADOBE	2008		27	3	-12.6	-2.2	9.2	24.7
ADOBE	2009		24	-3	-26.8	-17.2	0.0	39.3
ADOBE	2010		29	5	-17.7	-11.6	3.5	13.2
ADOBE	2011		34	5	-25.3	-0.5	33.5	58.4

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----	----(Count)----	------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2001		28					
ADOBE	2002		30	2	-51.3	-42.0	-19.9	5.7
ADOBE	2003		39	9	-40.3	-21.5	8.5	26.4
ADOBE	2004		57	18	-17.0	-3.4	23.6	45.5
ADOBE	2005		49	-8	-24.5	3.8	17.7	130.2
ADOBE	2006		52	3	-15.0	-1.5	10.7	60.7
ADOBE	2007		58	6	-8.5	2.3	24.2	103.6
ADOBE	2008		68	10	-28.8	-2.3	14.6	62.5
ADOBE	2009		65	-3	-38.7	-24.9	-10.3	111.7
ADOBE	2010		51	-14	-27.9	-6.5	7.1	21.4
ADOBE	2011		53	2	-16.1	28.2	41.0	59.4
ADOBE	2001		25					
ADOBE	2002		24	-1	-52.8	-46.0	-26.3	124.9
ADOBE	2003		23	-1	-29.0	-10.0	10.4	30.7
ADOBE	2004		31	8	-11.0	-0.3	16.8	44.1
ADOBE	2005		55	24	-14.4	-0.4	13.7	27.7
ADOBE	2006		58	3	-34.5	-2.6	10.3	97.5
ADOBE	2007		68	10	-46.1	7.2	22.9	56.4
ADOBE	2008		67	-1	-14.4	-1.3	17.6	216.9
ADOBE	2009		64	-3	-41.1	-19.9	-6.2	58.5
ADOBE	2010		72	8	-54.6	-9.0	4.0	25.3
ADOBE	2011		72	0	-15.7	27.0	36.2	87.5
ADOBE	2001		15					
ADOBE	2002		16	1	-47.0	-40.7	-17.3	50.7
ADOBE	2003		16	0	-32.0	1.0	29.5	46.5
ADOBE	2004		16	0	-23.0	-10.2	20.8	36.0
ADOBE	2005		28	12	-9.4	3.0	16.1	27.5
ADOBE	2006		23	-5	-24.2	-4.1	37.0	78.5
ADOBE	2007		22	-1	0.0	8.6	21.4	29.1
ADOBE	2008		25	3	-8.4	1.9	13.9	35.4
ADOBE	2009		21	-4	-30.9	-18.6	-9.2	8.4
ADOBE	2010		23	2	-37.7	-4.4	16.6	42.6
ADOBE	2011		29	6	-33.2	8.8	33.4	65.5
ADOBE	2001		15					
ADOBE	2002		16	1	-56.6	-48.5	-27.8	-12.7
ADOBE	2003		17	1	-26.9	-17.1	30.0	32.8
ADOBE	2004		17	0	-13.4	-6.1	19.9	46.9

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--	----(Percent)----			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2005		25	8	-22.3	-1.4	17.8	28.0
ADOBE	2006		29	4	-4.5	-1.1	19.4	51.0
ADOBE	2007		29	0	-9.1	8.0	21.9	33.9
ADOBE	2008		27	-2	-18.3	-4.9	10.2	32.1
ADOBE	2009		29	2	-30.8	-23.9	-6.1	15.9
ADOBE	2010		24	-5	-18.1	-2.1	11.1	26.5
ADOBE	2011		22	-2	7.8	28.5	34.0	81.8
ADOBE	2001		32					
ADOBE	2002		26	-6	-36.0	-23.5	-16.7	3.0
ADOBE	2003		12	-14	-15.4	-1.9	9.1	26.4
ADOBE	2004		5	-7	-14.6	-8.8	-1.0	1.2
ADOBE	2005		6	1	14.5	14.5	18.5	18.5
ADOBE	2006		4	-2				
ADOBE	2007		7	3	0.7	0.7	14.3	14.3
ADOBE	2008		6	-1	-23.4	-23.4	50.0	50.0
ADOBE	2009		6	0	-29.2	-29.2	-26.2	-26.2
ADOBE	2001		80					
ADOBE	2002		62	-18	-56.3	-25.1	-11.6	8.2
ADOBE	2003		53	-9	-18.0	2.2	13.6	58.1
ADOBE	2004		44	-9	-30.6	-9.5	-0.3	12.3
ADOBE	2005		66	22	-7.9	9.7	20.7	34.0
ADOBE	2006		59	-7	-19.8	-9.7	6.3	25.1
ADOBE	2007		91	32	-12.5	-3.5	20.1	65.3
ADOBE	2008		109	18	-35.0	-22.4	15.2	50.7
ADOBE	2009		158	49	-37.4	-29.0	-5.3	33.8
ADOBE	2010		144	-14	-37.9	-18.9	9.1	57.0
ADOBE	2011		142	-2	-27.5	-10.5	8.5	33.7
ADOBE	2001		19					
ADOBE	2002		24	5	-55.1	-40.0	-23.8	16.0
ADOBE	2003		26	2	-43.2	-29.5	-3.9	37.1
ADOBE	2004		24	-2	-33.4	3.9	28.4	57.9
ADOBE	2005		35	11	-27.4	-9.9	5.3	33.7
ADOBE	2006		33	-2	-22.9	-3.7	20.6	134.7
ADOBE	2007		35	2	-26.7	-7.9	18.2	41.6
ADOBE	2008		38	3	-15.8	11.0	40.3	78.0
ADOBE	2009		38	0	-34.9	-14.7	43.3	136.1
ADOBE	2010		41	3	-56.8	-37.9	-4.1	40.6

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					\multicolumn Percent Change in Total Compensation from Prior Year (Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			--(Count)--					
ADOBE	2011		58	17	-47.1	20.5	54.6	195.6
ADOBE	2001		16					
ADOBE	2002		16	0	-53.5	-36.8	5.6	9.0
ADOBE	2003		13	-3	-23.0	6.0	18.7	39.0
ADOBE	2004		20	7	-24.1	-3.7	6.4	13.8
ADOBE	2005		31	11	-2.4	1.8	17.7	32.9
ADOBE	2006		35	4	-6.8	7.4	47.4	63.2
ADOBE	2007		43	8	-9.2	-0.6	20.2	33.7
ADOBE	2008		37	-6	-26.4	-5.2	18.8	41.7
ADOBE	2009		32	-5	-26.7	-18.7	-13.0	16.3
ADOBE	2010		30	-2	-11.1	1.1	9.5	13.0
ADOBE	2011		36	6	-23.2	-13.7	40.0	58.7
ADOBE	2001		10					
ADOBE	2002		15	5	-39.0	-38.3	-20.3	-12.4
ADOBE	2003		18	3	-23.7	-1.9	17.3	31.3
ADOBE	2004		21	3	-25.5	-10.3	10.2	18.4
ADOBE	2005		21	0	-8.7	10.0	16.2	25.4
ADOBE	2006		20	-1	-10.9	-1.3	5.9	9.3
ADOBE	2007		24	4	-5.4	7.2	20.9	54.4
ADOBE	2008		23	-1	-10.2	-1.1	20.1	57.6
ADOBE	2009		21	-2	-30.8	-23.2	-6.8	-2.0
ADOBE	2010		24	3	-1.2	8.4	18.5	32.3
ADOBE	2011		25	1	-8.9	3.3	11.3	29.4
ADOBE	2001		14					
ADOBE	2002		16	2	-46.5	-34.4	-7.4	5.8
ADOBE	2003		17	1	-24.1	-7.5	17.6	28.4
ADOBE	2004		20	3	-11.4	-8.2	12.7	15.8
ADOBE	2005		26	6	-30.0	0.6	16.1	25.2
ADOBE	2006		27	1	-17.5	-2.2	6.9	93.7
ADOBE	2007		31	4	-0.2	12.2	32.6	54.6
ADOBE	2008		46	15	-29.4	-8.2	13.4	52.1
ADOBE	2009		44	-2	-27.1	-20.2	-3.2	167.0
ADOBE	2010		42	-2	-25.3	-4.3	9.1	40.7
ADOBE	2011		44	2	-16.5	-0.4	11.1	46.4
ADOBE	2001		28					
ADOBE	2002		37	9	-52.2	-34.8	-17.0	16.5

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
			Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title				(Percent)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			--(Count)--	--(Count)--				
ADOBE	2003	█	44	7	-49.5	-24.2	11.5	32.6
ADOBE	2004	█	40	-4	-10.6	1.5	17.0	28.9
ADOBE	2005	█	41	1	-14.8	6.3	16.1	27.9
ADOBE	2006	█	35	-6	-23.5	-5.3	7.4	25.1
ADOBE	2007	█	48	13	-9.4	13.7	28.2	52.6
ADOBE	2008	█	63	15	-23.9	-3.4	16.3	116.5
ADOBE	2009	█	64	1	-40.7	-19.7	-5.1	9.4
ADOBE	2010	█	48	-16	-21.1	-5.6	17.1	71.3
ADOBE	2011	█	48	0	-14.9	0.8	10.1	35.1
ADOBE	2001	█	7					
ADOBE	2002	█	8	1	-52.6	-46.6	-20.1	-11.1
ADOBE	2003	█	9	1	-4.6	-0.5	9.6	19.4
ADOBE	2004	█	16	7	-8.4	-4.1	17.6	28.4
ADOBE	2005	█	18	2	-19.1	1.8	14.3	46.8
ADOBE	2006	█	26	8	-28.7	-6.8	5.6	13.3
ADOBE	2007	█	29	3	-13.3	15.6	40.3	77.2
ADOBE	2008	█	39	10	-36.0	-11.5	6.1	138.0
ADOBE	2009	█	39	0	-21.4	-13.7	-3.4	74.3
ADOBE	2010	█	42	3	-47.8	-4.6	11.1	69.7
ADOBE	2011	█	40	-2	-66.7	-7.7	13.6	28.8
ADOBE	2001	█	10					
ADOBE	2002	█	12	2	-40.4	-30.9	-24.6	-20.9
ADOBE	2003	█	12	0	-18.5	-12.8	6.9	26.5
ADOBE	2004	█	13	1	-21.0	-12.2	8.6	24.1
ADOBE	2005	█	19	6	1.7	11.9	16.2	17.5
ADOBE	2006	█	26	7	-22.5	-6.5	5.7	18.1
ADOBE	2001	█	25					
ADOBE	2002	█	31	6	-50.4	-41.9	-7.6	139.0
ADOBE	2003	█	32	1	-34.8	-22.1	10.8	51.4
ADOBE	2004	█	39	7	-23.8	-4.8	7.4	17.2
ADOBE	2005	█	45	6	-20.3	4.7	18.1	38.1
ADOBE	2006	█	50	5	-31.7	-7.9	4.0	58.4
ADOBE	2007	█	52	2	-12.7	9.9	25.6	102.2
ADOBE	2008	█	48	-4	-23.7	-9.7	6.5	28.0
ADOBE	2009	█	51	3	-25.5	-12.1	-4.0	10.8
ADOBE	2010	█	49	-2	-49.9	0.7	15.2	143.0
ADOBE	2011	█	44	-5	-53.6	-1.7	8.4	23.4

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		------(Percent)------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2001		135					
ADOBE	2002		139	4	-48.9	-36.9	-10.7	93.7
ADOBE	2003		152	13	-41.7	-0.9	17.1	233.5
ADOBE	2004		166	14	-61.2	-9.8	2.5	30.1
ADOBE	2005		175	9	-36.6	2.3	20.2	122.1
ADOBE	2006		218	43	-38.8	-8.5	4.3	136.2
ADOBE	2007		212	-6	-56.0	-1.0	19.7	77.6
ADOBE	2008		220	8	-32.4	-6.4	13.2	96.6
ADOBE	2009		219	-1	-36.9	-17.9	-2.8	27.5
ADOBE	2010		203	-16	-70.8	0.0	12.5	83.3
ADOBE	2011		225	22	-58.9	-9.0	7.6	42.4
ADOBE	2001		31					
ADOBE	2002		22	-9	-51.1	-33.5	-22.3	-8.6
ADOBE	2003		27	5	-21.4	7.7	25.8	58.4
ADOBE	2004		26	-1	-21.3	-2.6	15.8	41.9
ADOBE	2005		39	13	-2.8	0.8	15.8	25.7
ADOBE	2006		42	3	-23.1	-6.0	29.2	42.1
ADOBE	2007		57	15	-21.9	0.5	17.6	46.0
ADOBE	2008		67	10	-23.5	-2.2	21.6	58.4
ADOBE	2009		60	-7	-34.7	-24.1	-14.0	5.3
ADOBE	2010		73	13	-22.0	-3.5	11.8	144.1
ADOBE	2011		70	-3	-30.8	20.0	41.2	110.6
ADOBE	2001		9					
ADOBE	2002		14	5	-55.1	-53.9	-29.8	0.1
ADOBE	2003		16	2	-31.0	-22.2	13.0	67.5
ADOBE	2004		12	-4	-27.4	-19.7	8.2	33.8
ADOBE	2005		14	2	-2.1	7.6	22.4	27.9
ADOBE	2006		18	4	-15.1	-3.5	8.8	34.6
ADOBE	2007		18	0	5.9	9.9	25.3	34.2
ADOBE	2008		20	2	-13.3	-6.6	7.4	14.0
ADOBE	2009		21	1	-31.5	-26.8	-14.1	-7.7
ADOBE	2010		20	-1	-17.4	-8.4	8.0	13.4
ADOBE	2011		34	14	25.2	31.8	68.7	94.9
ADOBE	2001		9					
ADOBE	2002		7	-2	-39.6	-29.1	-23.4	1.7
ADOBE	2003		4	-3	0.0	7.7	21.7	23.7

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
								(Percent)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			(Count)					
ADOBE	2004		7	3	-11.3	-11.3	2.5	2.5
ADOBE	2005		25	18	1.9	5.5	21.7	30.3
ADOBE	2006		31	6	-16.2	5.0	19.0	31.4
ADOBE	2007		32	1	-15.1	-5.2	7.0	18.9
ADOBE	2008		32	0	-14.5	3.8	12.6	35.7
ADOBE	2009		30	-2	-20.0	-9.1	-2.6	4.5
ADOBE	2010		20	-10	-9.5	5.9	14.6	33.0
ADOBE	2011		18	-2	-21.5	-10.9	6.1	42.4
ADOBE	2001		35					
ADOBE	2002		17	-18	-24.5	-19.8	-3.8	8.9
ADOBE	2003		14	-3	-21.2	-12.2	12.6	45.1
ADOBE	2004		9	-5	-23.6	-11.8	14.2	23.4
ADOBE	2005		7	-2	-15.3	4.1	43.4	48.3
ADOBE	2006		3	-4				
ADOBE	2007		3	0	-3.1	-3.1	-3.1	-3.1
ADOBE	2001		125					
ADOBE	2002		112	-13	-40.3	-23.5	-7.2	52.5
ADOBE	2003		95	-17	-25.1	1.1	19.4	58.3
ADOBE	2004		83	-12	-36.8	-11.1	2.5	23.6
ADOBE	2005		123	40	-32.8	4.5	20.3	51.6
ADOBE	2006		110	-13	-26.7	-9.4	9.4	37.0
ADOBE	2007		96	-14	-10.8	-0.5	18.0	48.7
ADOBE	2008		89	-7	-31.8	-3.3	15.3	49.7
ADOBE	2009		65	-24	-36.8	-17.2	-7.8	11.1
ADOBE	2010		39	-26	-20.7	3.3	11.3	23.4
ADOBE	2011		38	-1	-26.1	-0.9	8.8	29.8
ADOBE	2001		73					
ADOBE	2002		74	1	-55.7	-28.8	-12.3	47.3
ADOBE	2003		87	13	-29.6	0.0	18.1	47.5
ADOBE	2004		101	14	-30.4	-12.4	2.5	35.1
ADOBE	2005		163	62	-17.0	9.2	20.1	65.1
ADOBE	2006		191	28	-27.1	-9.3	5.7	45.4
ADOBE	2007		173	-18	-17.9	2.3	24.0	70.1
ADOBE	2008		171	-2	-38.0	-3.3	10.4	45.2
ADOBE	2009		151	-20	-30.0	-16.7	-5.2	21.6
ADOBE	2010		124	-27	-23.2	4.6	13.0	57.6
ADOBE	2011		133	9	-32.9	1.0	8.2	47.9

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

			Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title	--(Count)--	--(Count)--	Minimum	25th Percentile	75th Percentile	Maximum
						(Percent)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2001		24					
ADOBE	2002		20	-4	-46.1	-30.8	-19.2	2.3
ADOBE	2003		23	3	-10.7	5.3	20.7	29.3
ADOBE	2004		35	12	-23.8	-14.7	-1.5	7.3
ADOBE	2005		44	9	-21.3	9.6	18.6	32.8
ADOBE	2006		50	6	-15.5	-4.4	6.0	27.6
ADOBE	2007		46	-4	-20.1	5.0	31.9	62.9
ADOBE	2008		49	3	-34.2	-9.2	15.2	68.0
ADOBE	2009		51	2	-32.7	-15.9	-3.9	12.6
ADOBE	2010		46	-5	-14.6	-1.2	10.5	51.8
ADOBE	2011		46	0	-31.9	1.0	12.6	26.5
ADOBE	2002		3					
ADOBE	2007		7					
ADOBE	2008		14	7	5.0	5.0	6.6	6.6
ADOBE	2009		26	12	-9.3	-3.9	0.0	10.4
ADOBE	2010		30	4	-30.9	-1.3	10.0	22.1
ADOBE	2011		35	5	-19.1	-12.9	6.0	48.0
ADOBE	2002		10					
ADOBE	2003		8	-2	-41.8	-41.8	22.7	22.7
ADOBE	2004		16	8	-20.0	-17.8	4.5	7.1
ADOBE	2005		29	13	-3.0	0.8	20.7	31.7
ADOBE	2006		27	-2	-21.1	-5.9	4.3	16.5
ADOBE	2007		32	5	-8.4	1.6	7.4	21.5
ADOBE	2008		43	11	-8.2	3.1	11.2	20.9
ADOBE	2009		48	5	-12.5	-4.9	8.0	26.3
ADOBE	2010		56	8	-26.9	-2.4	15.4	41.9
ADOBE	2011		61	5	-33.8	-12.4	11.4	33.7
ADOBE	2001		26					
ADOBE	2002		17	-9	-45.0	-30.3	-22.1	-0.6
ADOBE	2003		15	-2	1.3	2.3	14.8	24.3
ADOBE	2004		14	-1	-14.9	-9.5	1.4	6.0
ADOBE	2005		12	-2	-14.8	10.1	16.9	24.4
ADOBE	2006		21	9	-6.5	-4.1	2.8	8.8
ADOBE	2001		17					
ADOBE	2002		15	-2	-27.8	-25.8	-16.2	6.7

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

			Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
			--(Count)--	--(Count)--	Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title					(Percent)	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
ADOBE	2003		16	1	-18.6	-2.4	11.4	27.1
ADOBE	2004		22	6	-20.6	-9.1	4.2	17.0
ADOBE	2005		32	10	-18.3	5.1	22.9	42.9
ADOBE	2006		24	-8	-29.8	-18.9	3.3	27.1
ADOBE	2007		16	-8	-9.8	-3.6	29.1	32.7
ADOBE	2008		1	-15				
ADOBE	2001		2					
ADOBE	2002		4	2	-28.1	-28.1	-28.1	-28.1
ADOBE	2003		7	3	11.1	11.1	32.2	32.2
ADOBE	2004		7	0	-26.0	-26.0	-9.6	-9.6
ADOBE	2005		15	8	-15.4	-2.8	21.4	22.5
ADOBE	2006		25	10	-23.6	-6.3	12.0	20.4
ADOBE	2007		27	2	-13.4	4.5	21.2	73.4
ADOBE	2008		1	-26				
APPLE	2005		3					
APPLE	2006		2	-1	19.7	19.7	38.4	38.4
APPLE	2007		7	5	-7.5	-7.5	-7.5	-7.5
APPLE	2008		17	10	-24.7	-24.4	38.8	96.0
APPLE	2009		46	29	-48.5	9.1	54.7	87.3
APPLE	2010		79	33	-29.9	-4.4	28.2	79.0
APPLE	2011		85	6	-42.8	-28.5	21.0	124.2
APPLE	2005		12					
APPLE	2006		11	-1	-23.0	-1.9	22.0	39.5
APPLE	2007		20	9	-13.6	1.6	69.5	130.1
APPLE	2008		28	8	-41.5	-31.8	-13.9	37.8
APPLE	2009		97	69	-49.7	-19.8	27.1	98.1
APPLE	2010		177	80	-45.7	-18.1	23.8	101.3
APPLE	2011		218	41	-64.1	-20.7	13.7	138.7
APPLE	2005		6					
APPLE	2006		3	-3	-33.0	-33.0	59.2	59.2
APPLE	2007		7	4	-2.3	-2.3	118.7	118.7
APPLE	2008		20	13	-37.1	-24.8	0.1	1.5
APPLE	2009		56	36	-62.4	-14.3	12.5	183.7
APPLE	2010		105	49	-32.1	-8.0	25.3	259.8
APPLE	2011		133	28	-69.0	-28.1	14.4	239.8

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class

2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year				
					Minimum	25th Percentile	75th Percentile	Maximum	
			--(Count)--				--(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2005		2					
APPLE	2006		2	0	-36.4	-36.4	10.0	10.0
APPLE	2007		4	2	7.7	7.7	107.3	107.3
APPLE	2008		4	0	-36.0	-36.0	255.2	255.2
APPLE	2009		13	9	-46.5	-7.6	49.0	66.3
APPLE	2010		32	19	-34.7	11.0	29.9	40.0
APPLE	2011		46	14	-58.8	-22.2	15.6	231.8
APPLE	2005		1					
APPLE	2006		3	2	37.6	37.6	37.6	37.6
APPLE	2007		3	0	-10.6	-10.6	-10.6	-10.6
APPLE	2008		35	32	-35.9	-35.9	1.4	1.4
APPLE	2009		9	-26	-54.0	-32.9	11.2	15.8
APPLE	2010		6	-3	-31.0	-16.5	-1.0	-0.6
APPLE	2011		12	6	1.4	7.9	13.0	62.7
APPLE	2005		2					
APPLE	2006		5	3	29.1	29.1	29.1	29.1
APPLE	2007		8	3	-25.7	6.0	54.1	70.3
APPLE	2008		40	32	-45.4	-27.4	3.6	11.6
APPLE	2009		21	-19	-62.4	-36.3	19.6	45.1
APPLE	2010		24	3	-28.2	-3.3	16.8	191.9
APPLE	2011		33	9	-35.4	0.8	43.4	191.7
APPLE	2005		31					
APPLE	2006		29	-2	-26.9	0.5	65.3	110.4
APPLE	2007		30	1	-37.4	-1.3	54.5	106.2
APPLE	2008		42	12	-38.2	-23.2	51.8	133.3
APPLE	2009		38	-4	-48.1	-36.1	14.1	106.4
APPLE	2010		50	12	-46.4	0.8	32.0	196.1
APPLE	2011		47	-3	-39.9	0.1	37.4	221.6
APPLE	2005		34					
APPLE	2006		40	6	-74.0	-14.4	47.4	116.1
APPLE	2007		50	10	-30.3	8.7	58.6	166.7
APPLE	2008		49	-1	-56.5	-34.2	1.5	166.4
APPLE	2009		43	-6	-61.4	-3.5	32.2	93.5
APPLE	2010		50	7	-34.7	0.0	47.3	92.7
APPLE	2011		66	16	-47.4	-9.6	21.1	173.2

NERA Economic Consulting
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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			(Count)	(Count)	(Percent)	(Percent)	(Percent)	(Percent)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2005		22					
APPLE	2006		26	4	-34.6	-8.9	32.5	60.2
APPLE	2007		30	4	-52.4	8.4	97.1	131.0
APPLE	2008		32	2	-60.7	-36.1	5.9	258.7
APPLE	2009		39	7	-64.8	-0.8	21.9	102.0
APPLE	2010		44	5	-37.8	-6.6	21.5	93.6
APPLE	2011		43	-1	-34.3	-6.1	16.1	76.8
APPLE	2001		27					
APPLE	2002		31	4	-74.2	-59.8	-37.3	-25.4
APPLE	2003		34	3	-64.0	25.8	58.6	71.2
APPLE	2004		37	3	-25.6	15.9	34.3	79.7
APPLE	2005		3	-34	-3.0	-3.0	28.6	28.6
APPLE	2006		6	3	18.5	18.5	39.7	39.7
APPLE	2007		8	2	1.6	38.1	62.6	636.7
APPLE	2008		6	-2	-70.5	-48.1	-35.6	-33.6
APPLE	2009		11	5	-56.2	-39.9	37.5	39.1
APPLE	2010		13	2	-23.5	-15.4	31.1	51.6
APPLE	2011		13	0	-36.2	-17.7	24.5	52.4
APPLE	2001		23					
APPLE	2002		27	4	-36.4	-15.3	-3.2	3.8
APPLE	2003		21	-6	-3.8	1.9	21.6	25.7
APPLE	2004		18	-3	-15.7	-6.1	4.4	22.7
APPLE	2005		6	-12	-3.5	-3.5	-3.5	-3.5
APPLE	2006		3	-3	8.5	8.5	8.5	8.5
APPLE	2007		3	0				
APPLE	2008		4	1	9.4	9.4	36.3	36.3
APPLE	2009		2	-2				
APPLE	2010		3	1	7.9	7.9	17.5	17.5
APPLE	2001		42					
APPLE	2002		43	1	-37.7	-16.9	-1.2	22.5
APPLE	2003		44	1	-19.5	1.0	13.3	35.2
APPLE	2004		52	8	-11.3	-0.9	12.9	28.1
APPLE	2005		1	-51	-9.3	-9.3	-9.3	-9.3
APPLE	2001		17					
APPLE	2002		20	3	-29.1	-20.1	-1.3	4.2
APPLE	2003		25	5	-44.6	4.0	22.9	54.1

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees --(Count)--	Change from Previous Year --(Count)--	Percent Change in Total Compensation from Prior Year			
					Minimum --(Percent)--	25th Percentile	75th Percentile	Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2004		27	2	-32.1	-8.9	18.0	37.3
APPLE	2005		4	-23				
APPLE	2005		98					
APPLE	2006		135	37	-34.0	-2.0	21.6	146.9
APPLE	2007		161	26	-45.3	4.4	70.8	164.4
APPLE	2008		176	15	-58.8	-29.9	1.1	148.7
APPLE	2009		205	29	-53.5	-10.7	25.2	162.3
APPLE	2010		251	46	-66.0	-1.8	28.1	232.1
APPLE	2011		337	86	-55.1	-10.3	20.3	161.2
APPLE	2005		20					
APPLE	2006		21	1	-27.8	-8.9	36.1	86.9
APPLE	2007		46	25	-33.2	1.9	51.6	140.1
APPLE	2008		60	14	-66.3	-38.0	0.0	240.7
APPLE	2009		84	24	-67.6	-40.7	33.0	193.2
APPLE	2010		116	32	-47.8	-10.5	30.2	228.3
APPLE	2011		154	38	-54.9	-20.9	12.8	166.7
APPLE	2001		27					
APPLE	2002		25	-2	-46.5	-20.7	-9.0	4.0
APPLE	2003		31	6	-5.0	7.1	24.4	32.8
APPLE	2004		34	3	-19.4	-3.0	12.3	24.5
APPLE	2005		3	-31	0.0	0.0	2.1	2.1
APPLE	2006		3	0	-0.5	-0.5	-0.5	-0.5
APPLE	2007		2	-1	-6.9	-6.9	8.1	8.1
APPLE	2008		6	4	-13.0	-13.0	4.6	4.6
APPLE	2009		10	4	-26.8	-8.6	16.7	23.5
APPLE	2010		12	2	-3.8	-3.3	18.4	36.9
APPLE	2011		16	4	-64.5	-22.6	8.7	10.1
APPLE	2001		87					
APPLE	2002		92	5	-49.3	-23.5	-8.9	5.2
APPLE	2003		102	10	-33.0	0.0	17.9	43.8
APPLE	2004		110	8	-16.1	-4.5	15.1	40.4
APPLE	2005		5	-105				
APPLE	2006		6	1	24.0	33.8	49.8	52.4
APPLE	2007		11	5	27.7	28.2	127.6	134.4
APPLE	2008		12	1	-48.7	-27.3	-20.2	-11.2
APPLE	2009		19	7	-24.0	5.5	30.9	89.6

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees --(Count)--	Change from Previous Year --(Count)--	Percent Change in Total Compensation from Prior Year --(Percent)--			
					Minimum	25th Percentile	75th Percentile	Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2010		28	9	-43.7	-8.3	33.2	286.6
APPLE	2011		29	1	-43.3	-13.5	17.5	53.1
APPLE	2001		82					
APPLE	2002		88	6	-57.4	-29.5	-15.8	3.8
APPLE	2003		101	13	-35.0	0.7	24.1	103.6
APPLE	2004		111	10	-33.5	-2.1	22.2	57.1
APPLE	2005		2	-109	-5.9	-5.9	-5.9	-5.9
APPLE	2006		1	-1	20.4	20.4	20.4	20.4
APPLE	2007		7	6	75.1	75.1	75.1	75.1
APPLE	2008		8	1	-56.4	-29.3	-5.7	42.4
APPLE	2009		7	-1	-39.6	-20.8	47.5	58.5
APPLE	2010		9	2	-46.2	-33.5	9.5	35.7
APPLE	2011		12	3	-57.5	-29.0	38.6	50.3
APPLE	2005		11					
APPLE	2006		7	-4	-7.1	7.0	49.4	59.2
APPLE	2007		11	4	-47.5	-47.5	-47.5	-47.5
APPLE	2008		14	3	-10.8	-4.1	65.2	77.2
APPLE	2009		18	4	-28.4	9.0	37.8	70.2
APPLE	2010		25	7	-40.6	12.6	93.3	278.1
APPLE	2011		30	5	-30.9	-12.1	-0.3	15.6
APPLE	2005		20					
APPLE	2006		24	4	-29.5	3.6	59.4	99.4
APPLE	2007		15	-9	17.7	29.2	82.1	126.0
APPLE	2008		19	4	-53.5	-45.0	-17.7	215.3
APPLE	2009		23	4	-4.9	8.1	17.1	34.4
APPLE	2010		29	6	-8.5	-2.3	39.4	77.7
APPLE	2011		52	23	-39.9	-2.7	13.0	89.2
APPLE	2005		11					
APPLE	2006		15	4	-46.9	39.9	163.3	182.6
APPLE	2007		20	5	-30.9	-7.9	79.7	212.5
APPLE	2008		28	8	-44.3	-37.2	-1.1	58.4
APPLE	2009		27	-1	-61.6	-27.1	24.7	71.1
APPLE	2010		30	3	-28.7	4.8	59.4	316.1
APPLE	2011		36	6	-33.2	-13.5	17.9	60.7
APPLE	2001		13					

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--		--(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2002		14	1	-33.2	-19.7	0.8	2.5
APPLE	2003		18	4	-22.6	-12.6	25.9	49.2
APPLE	2004		18	0	-21.4	-5.2	13.4	18.4
APPLE	2005		35	17				
APPLE	2006		26	-9	-13.6	4.5	12.4	71.8
APPLE	2007		23	-3	-23.3	-3.4	7.0	93.1
APPLE	2008		18	-5	-7.3	3.1	10.9	44.9
APPLE	2009		14	-4	4.1	6.7	69.4	89.5
APPLE	2010		5	-9	-3.9	-3.9	35.2	35.2
APPLE	2001		3					
APPLE	2002		3	0	-54.2	-54.2	-15.4	-15.4
APPLE	2003		5	2	4.5	4.5	16.4	16.4
APPLE	2004		8	3	-21.8	-2.2	10.7	17.9
APPLE	2005		80	72				
APPLE	2006		78	-2	-40.8	-7.6	13.7	112.3
APPLE	2007		75	-3	-39.5	1.6	50.7	127.0
APPLE	2008		102	27	-38.7	-12.7	19.8	102.4
APPLE	2009		103	1	-42.1	-5.5	18.3	131.1
APPLE	2010		114	11	-37.1	-1.8	37.1	157.5
APPLE	2011		115	1	-46.1	-4.4	44.8	158.0
APPLE	2001		81					
APPLE	2002		111	30	-30.6	-18.8	-1.6	8.1
APPLE	2003		97	-14	-17.8	0.5	9.1	27.2
APPLE	2004		73	-24	-9.0	0.5	5.7	17.9
APPLE	2005		7	-66	0.2	0.2	5.7	5.7
APPLE	2001		334					
APPLE	2002		365	31	-46.9	-17.0	-1.2	49.0
APPLE	2003		338	-27	-23.5	0.9	12.0	97.3
APPLE	2004		342	4	-18.7	-4.2	6.1	25.7
APPLE	2005		18	-324	-0.1	2.8	6.9	22.6
APPLE	2006		1	-17	-6.8	-6.8	-6.8	-6.8
APPLE	2001		78					
APPLE	2002		83	5	-55.2	-24.8	-14.3	2.8
APPLE	2003		90	7	-53.4	2.9	25.4	92.4
APPLE	2004		108	18	-50.7	-6.5	15.6	408.1
APPLE	2005		3	-105				

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
			(Count)	(Count)	Minimum	25th Percentile	75th Percentile	Maximum
					(Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2001		370					
APPLE	2002		409	39	-53.6	-23.7	-5.9	38.8
APPLE	2003		444	35	-40.5	0.6	17.8	82.2
APPLE	2004		485	41	-53.6	-5.8	12.4	51.5
APPLE	2005		9	-476	-2.3	-2.3	7.2	7.2
APPLE	2001		547					
APPLE	2002		591	44	-50.0	-17.9	-1.2	11.4
APPLE	2003		608	17	-28.5	-0.1	12.8	67.1
APPLE	2004		621	13	-25.2	-4.4	8.2	45.3
APPLE	2005		22	-599	-12.8	0.0	34.5	45.0
APPLE	2005		1					
APPLE	2006		1	0	0.6	0.6	0.6	0.6
APPLE	2007		3	2	2.1	2.1	2.1	2.1
APPLE	2008		4	1	-25.1	-25.1	-2.9	-2.9
APPLE	2009		9	5	-59.7	-41.8	-4.5	10.6
APPLE	2010		49	40	-5.1	-0.9	6.7	39.2
APPLE	2011		68	19	-50.0	-8.6	23.9	174.5
APPLE	2005		6					
APPLE	2006		12	6	3.8	4.0	6.6	15.8
APPLE	2007		17	5	-29.0	-19.2	11.9	22.2
APPLE	2008		19	2	-32.8	-9.5	60.8	140.9
APPLE	2009		23	4	-39.2	-14.7	17.3	43.3
APPLE	2010		26	3	-22.5	-3.3	42.7	69.9
APPLE	2011		24	-2	-42.7	-18.8	3.0	26.5
APPLE	2005		10					
APPLE	2006		15	5	-1.8	0.0	8.3	8.5
APPLE	2007		16	1	-16.6	10.3	71.7	79.3
APPLE	2008		26	10	-36.9	-6.8	42.4	127.0
APPLE	2009		20	-6	-21.7	-16.5	7.4	81.8
APPLE	2010		23	3	-34.4	2.3	56.4	93.5
APPLE	2011		17	-6	-36.8	4.4	49.5	90.9
APPLE	2005		13					
APPLE	2006		12	-1	-9.4	2.8	13.5	64.0
APPLE	2007		14	2	-0.8	55.1	105.6	126.0

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							(Percent)	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			---(Count)---					
APPLE	2008		13	-1	-49.4	-34.3	8.3	84.7
APPLE	2009		19	6	-35.1	-4.5	7.0	64.2
APPLE	2010		21	2	-38.0	2.8	35.5	184.3
APPLE	2011		29	8	-41.3	1.5	38.7	94.0
APPLE	2005		14					
APPLE	2006		19	5	-46.6	-0.2	9.8	100.3
APPLE	2007		24	5	-29.6	-0.2	50.3	65.4
APPLE	2008		27	3	-41.1	-10.9	21.8	33.1
APPLE	2009		42	15	-33.0	-2.3	31.5	72.5
APPLE	2010		53	11	-29.6	-4.6	47.9	327.4
APPLE	2011		83	30	-39.4	-11.5	31.1	187.4
APPLE	2005		15					
APPLE	2006		14	-1	-14.2	5.2	26.8	49.8
APPLE	2007		25	11	-51.3	0.0	44.7	83.9
APPLE	2008		36	11	-47.6	-17.9	20.9	203.9
APPLE	2009		36	0	-49.4	-27.4	6.5	59.1
APPLE	2010		54	18	-33.3	7.2	65.8	151.8
APPLE	2011		75	21	-61.2	-12.7	20.0	180.4
APPLE	2005		5					
APPLE	2006		8	3	-17.8	3.9	10.1	17.6
APPLE	2007		12	4	-37.8	-24.8	106.7	165.6
APPLE	2008		15	3	-42.1	-33.0	18.6	45.8
APPLE	2009		23	8	-62.8	-37.3	17.7	32.8
APPLE	2010		31	8	-45.4	-6.9	60.8	305.6
APPLE	2011		48	17	-61.1	-25.3	6.8	76.7
APPLE	2005		4					
APPLE	2006		11	7	-25.0	-25.0	4.1	4.1
APPLE	2007		10	-1	-27.2	-1.8	4.8	15.7
APPLE	2008		12	2	-26.2	-25.4	17.6	109.9
APPLE	2009		17	5	-48.4	-26.8	32.4	34.5
APPLE	2010		24	7	-63.8	-21.6	-0.5	45.4
APPLE	2011		37	13	-39.5	-13.3	16.5	98.8
APPLE	2001		5					
APPLE	2002		5	0	-8.4	-3.9	0.6	1.4
APPLE	2003		5	0	6.0	6.0	26.2	26.2

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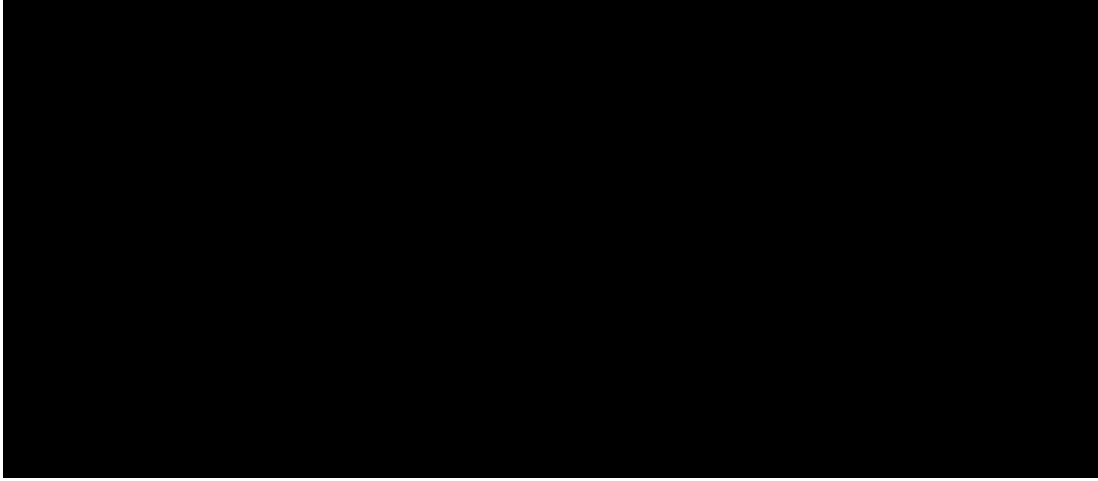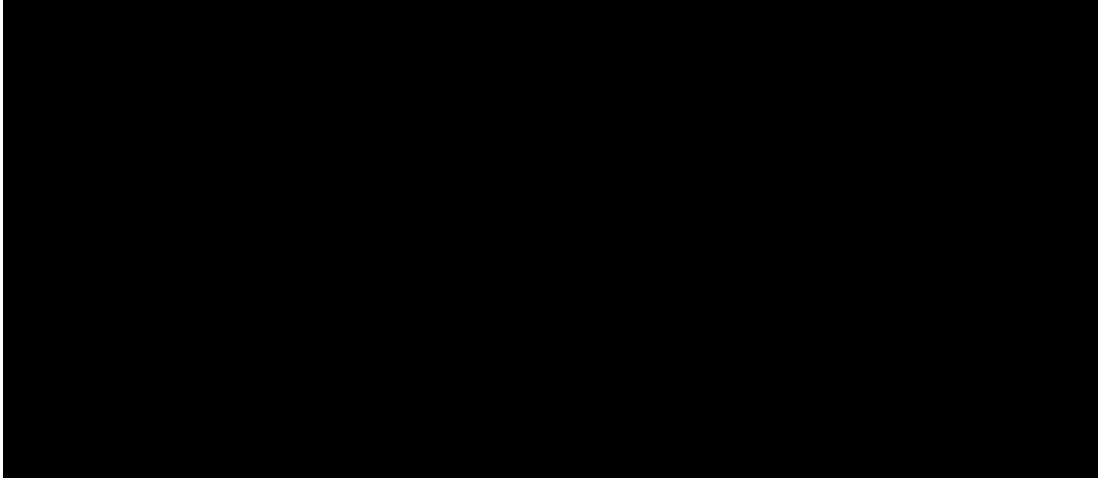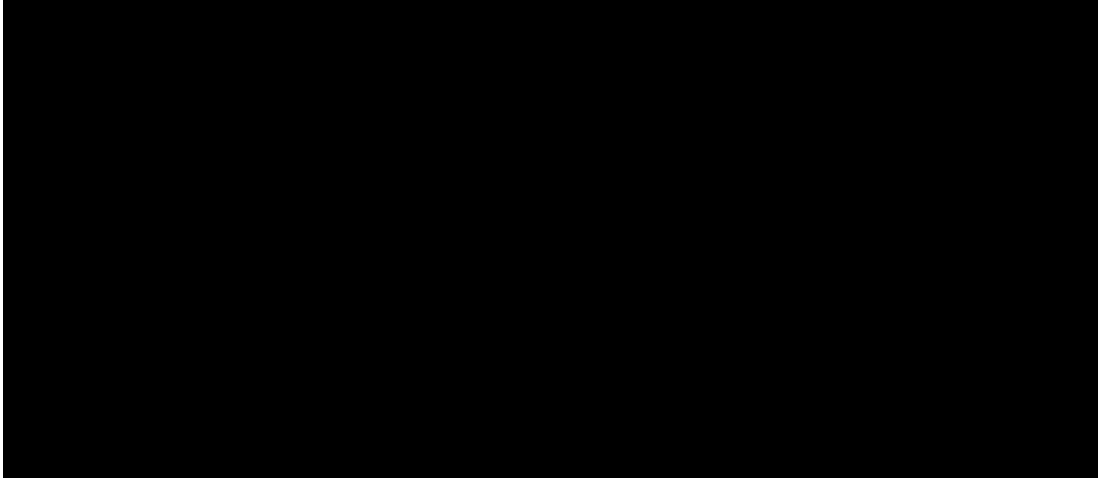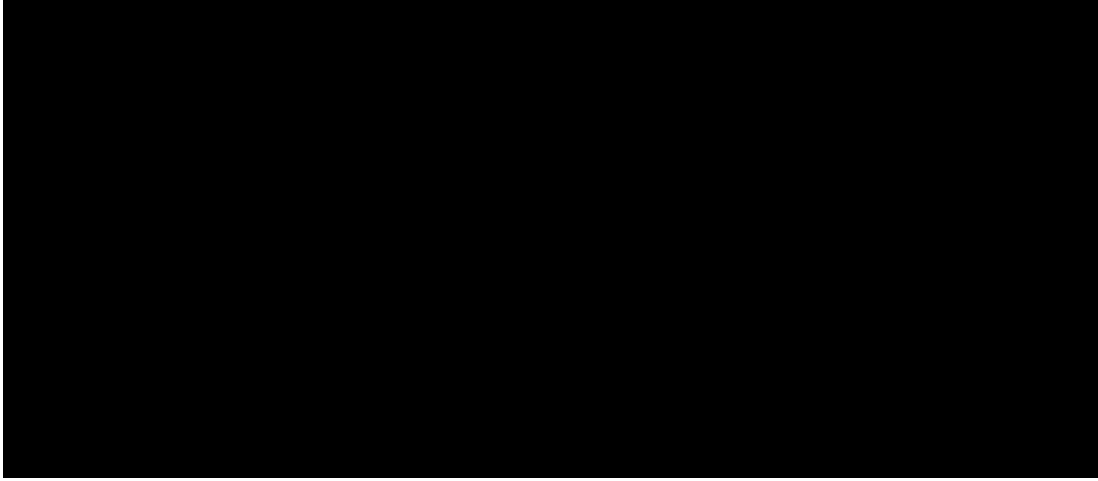
Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--		--(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2004		6	1	-5.6	-3.3	3.1	5.7
APPLE	2005		14	8				
APPLE	2006		22	8	-6.7	3.6	16.4	33.5
APPLE	2007		23	1	-14.6	-0.8	28.7	75.1
APPLE	2008		34	11	-22.6	-8.6	6.6	65.8
APPLE	2009		26	-8	-22.4	15.6	37.5	65.2
APPLE	2010		40	14	-1.7	5.1	25.1	103.4
APPLE	2011		49	9	-32.2	-8.9	9.5	55.5
APPLE	2001		16					
APPLE	2002		15	-1	-30.7	-14.1	-7.9	4.8
APPLE	2003		17	2	-8.3	0.0	16.2	21.2
APPLE	2004		12	-5	-10.8	-0.8	3.3	9.4
APPLE	2005		25	13	11.8	11.8	30.6	30.6
APPLE	2006		30	5	-27.3	10.6	61.4	99.2
APPLE	2007		33	3	-36.6	-3.3	37.3	78.2
APPLE	2008		32	-1	-43.4	-13.0	1.6	135.7
APPLE	2009		29	-3	-24.9	4.3	24.9	120.5
APPLE	2010		33	4	-7.5	-1.6	11.2	39.4
APPLE	2011		52	19	-26.7	-2.6	15.7	20.6
APPLE	2001		31					
APPLE	2002		40	9	-41.3	-16.4	-2.4	24.3
APPLE	2003		37	-3	-21.0	-12.0	15.2	43.7
APPLE	2004		45	8	-10.1	-4.3	6.9	21.2
APPLE	2005		24	-21	-7.8	0.2	13.6	15.4
APPLE	2006		25	1	-49.8	51.1	100.5	266.2
APPLE	2007		25	0	-0.9	14.8	41.1	88.3
APPLE	2008		30	5	-51.4	-27.9	-6.8	-2.2
APPLE	2009		31	1	-39.3	8.8	23.6	39.7
APPLE	2010		31	0	-40.4	-5.1	16.2	61.1
APPLE	2011		33	2	-17.6	3.2	36.4	114.2
APPLE	2001		26					
APPLE	2002		24	-2	-22.1	-8.8	0.6	8.1
APPLE	2003		19	-5	-1.3	1.2	10.8	13.1
APPLE	2004		13	-6	-10.2	-0.9	6.6	12.5
APPLE	2005		1	-12	1.4	1.4	1.4	1.4
APPLE	2006		1	0	-1.4	-1.4	-1.4	-1.4

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

			Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title	--(Count)--	--(Count)--	--(Percent)--			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2001	■	32					
APPLE	2002	■	27	-5	-36.1	-9.9	1.1	5.4
APPLE	2003	■	25	-2	0.8	3.5	11.8	41.6
APPLE	2004	■	28	3	-27.9	-2.5	6.4	16.0
APPLE	2005	■	1	-27				
APPLE	2006	■	1	0	4.4	4.4	4.4	4.4
APPLE	2001	■	45					
APPLE	2002	■	44	-1	-31.9	-20.9	-1.5	10.1
APPLE	2003	■	43	-1	-13.1	-0.8	6.2	19.0
APPLE	2004	■	52	9	-9.5	-1.8	5.2	9.6
APPLE	2005	■	17					
APPLE	2006	■	22	5	-1.4	-0.2	6.9	36.2
APPLE	2007	■	26	4	-22.5	0.6	4.0	39.2
APPLE	2008	■	31	5	-11.6	3.0	9.3	52.7
APPLE	2009	■	28	-3	-15.6	2.5	7.6	47.0
APPLE	2010	■	17	-11	-3.4	0.0	8.8	70.9
APPLE	2011	■	25	8	-2.1	-1.4	5.3	54.5
APPLE	2005	■	19					
APPLE	2006	■	20	1	-27.5	1.2	15.2	88.5
APPLE	2007	■	23	3	-34.8	-23.4	41.3	50.4
APPLE	2008	■	41	18	-49.9	-14.3	3.0	30.4
APPLE	2009	■	30	-11	-34.4	8.8	39.7	62.6
APPLE	2010	■	48	18	-28.8	-9.2	24.4	84.0
APPLE	2011	■	64	16	-32.7	-6.1	7.6	52.6
APPLE	2005	■	6					
APPLE	2006	■	9	3	8.7	37.4	43.1	56.9
APPLE	2007	■	10	1	-1.8	17.2	36.6	67.9
APPLE	2008	■	17	7	-16.4	-15.4	-3.2	36.8
APPLE	2009	■	14	-3	-48.5	0.8	23.6	35.4
APPLE	2010	■	22	8	-9.6	-6.9	2.7	41.8
APPLE	2011	■	31	9	-45.9	-15.0	4.2	14.9
APPLE	2001	■	20					
APPLE	2002	■	26	6	-31.3	-21.7	1.0	16.7
APPLE	2003	■	27	1	-18.3	-1.8	12.8	43.2
APPLE	2004	■	21	-6	-40.0	-9.1	7.7	18.0

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
			Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title	--(Count)--	--(Count)--	--------------------------(Percent)--------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2001	[REDACTED]	24					
APPLE	2002	[REDACTED]	22	-2	-35.3	-25.5	1.2	8.7
APPLE	2003	[REDACTED]	27	5	-9.1	0.0	12.2	25.0
APPLE	2004	[REDACTED]	34	7	-9.7	-2.4	6.7	10.9
APPLE	2005	[REDACTED]	10					
APPLE	2006	[REDACTED]	21	11	-3.8	3.0	43.4	55.2
APPLE	2007	[REDACTED]	28	7	-30.1	-1.1	37.9	45.1
APPLE	2008	[REDACTED]	54	26	-39.3	-26.9	2.0	57.2
APPLE	2009	[REDACTED]	53	-1	-34.4	-9.1	33.8	74.1
APPLE	2010	[REDACTED]	96	43	-29.6	3.8	36.9	79.3
APPLE	2011	[REDACTED]	109	13	-38.7	-10.2	12.6	89.8
APPLE	2005	[REDACTED]	3					
APPLE	2006	[REDACTED]	5	2	-38.9	-38.9	1.6	1.6
APPLE	2007	[REDACTED]	9	4	-0.4	4.4	39.2	54.3
APPLE	2008	[REDACTED]	15	6	-22.4	-18.6	15.8	19.6
APPLE	2009	[REDACTED]	23	8	-21.7	6.1	78.3	94.9
APPLE	2010	[REDACTED]	27	4	-6.9	1.1	17.9	125.5
APPLE	2011	[REDACTED]	49	22	-41.3	-4.3	15.1	138.4
APPLE	2005	[REDACTED]	10					
APPLE	2006	[REDACTED]	10	0	-3.0	31.4	130.4	213.6
APPLE	2007	[REDACTED]	14	4	-16.0	25.0	40.1	53.6
APPLE	2008	[REDACTED]	16	2	-40.3	-28.5	-8.2	24.1
APPLE	2009	[REDACTED]	8	-8	-20.5	-0.1	67.9	75.3
APPLE	2010	[REDACTED]	12	4	-11.8	0.0	44.4	55.9
APPLE	2011	[REDACTED]	26	14	-0.7	4.0	18.8	19.9
APPLE	2005	[REDACTED]	15					
APPLE	2006	[REDACTED]	14	-1	-36.8	3.0	37.1	106.3
APPLE	2007	[REDACTED]	21	7	-6.9	-1.3	65.0	70.8
APPLE	2008	[REDACTED]	24	3	-62.7	-46.5	-0.9	197.4
APPLE	2009	[REDACTED]	23	-1	-55.8	-28.4	20.8	63.2
APPLE	2010	[REDACTED]	23	0	-35.7	0.8	33.0	134.1
APPLE	2011	[REDACTED]	25	2	-33.1	-11.1	26.1	117.3
APPLE	2005	[REDACTED]	11					
APPLE	2006	[REDACTED]	12	1	1.7	6.4	47.4	57.6

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--	\<-------- Percent Change in Total Compensation from Prior Year (Percent) --------\>			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2007		13	1	-14.2	-1.9	7.6	48.8
APPLE	2008		18	5	-27.9	-6.8	3.2	5.7
APPLE	2009		22	4	-40.4	-0.4	25.9	68.9
APPLE	2010		26	4	-7.5	-2.7	6.9	96.9
APPLE	2011		41	15	-29.3	1.1	18.6	102.6
APPLE	2005		26					
APPLE	2006		23	-3	-20.9	-2.4	24.5	108.2
APPLE	2007		29	6	-32.8	-25.0	1.6	34.4
APPLE	2008		32	3	-42.9	-31.5	-0.1	114.0
APPLE	2009		33	1	-45.5	-16.5	4.6	32.5
APPLE	2010		41	8	-26.8	3.6	48.1	216.8
APPLE	2011		58	17	-40.9	0.4	34.5	146.0
APPLE	2005		14					
APPLE	2006		23	9	-27.5	-18.2	3.4	58.6
APPLE	2007		34	11	-46.6	2.6	109.1	174.6
APPLE	2008		35	1	-49.3	-39.9	-0.7	6.0
APPLE	2009		55	20	-52.0	-23.6	29.0	109.3
APPLE	2010		62	7	-18.1	-0.2	40.0	103.2
APPLE	2011		74	12	-45.3	-12.8	24.5	143.2
APPLE	2005		3					
APPLE	2006		1	-2				
APPLE	2007		8	7	-55.0	-55.0	-55.0	-55.0
APPLE	2008		20	12	-38.1	-38.1	17.1	17.1
APPLE	2009		28	8	-23.8	-14.7	32.6	60.1
APPLE	2010		32	4	-27.1	2.4	38.0	92.4
APPLE	2011		35	3	-46.8	-6.0	29.4	70.1
APPLE	2005		14					
APPLE	2006		14	0	0.0	0.3	9.4	49.4
APPLE	2007		16	2	0.8	30.0	61.0	66.6
APPLE	2008		22	6	-44.5	-32.8	-18.9	27.3
APPLE	2009		31	9	-35.9	-27.8	17.0	53.7
APPLE	2010		32	1	-53.4	-15.8	40.8	58.0
APPLE	2011		15	-17	-30.1	-26.6	11.3	24.0
APPLE	2005		23					
APPLE	2006		24	1	-10.4	0.1	6.3	39.9

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		-------------------------------(Percent)-------------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2007		28	4	-6.1	-2.2	10.0	74.1
APPLE	2008		27	-1	-19.1	2.3	61.7	208.4
APPLE	2009		33	6	-62.4	-4.2	9.0	50.0
APPLE	2010		31	-2	-80.1	-26.2	21.5	88.6
APPLE	2005		85					
APPLE	2006		87	2	-27.5	-8.9	24.0	98.4
APPLE	2007		110	23	-50.0	4.9	57.4	162.7
APPLE	2008		118	8	-51.4	-27.3	5.4	148.9
APPLE	2009		129	11	-45.6	-2.4	28.6	105.3
APPLE	2010		175	46	-72.7	-2.9	33.4	159.5
APPLE	2011		198	23	-53.3	-1.0	31.8	228.8
APPLE	2005		120					
APPLE	2006		140	20	-40.6	-7.9	24.7	89.9
APPLE	2007		162	22	-38.7	-2.2	45.1	128.1
APPLE	2008		177	15	-59.4	-26.7	3.8	167.2
APPLE	2009		210	33	-56.5	2.6	25.6	131.1
APPLE	2010		258	48	-79.1	-2.0	16.5	118.6
APPLE	2011		297	39	-52.5	-7.7	19.6	149.5
APPLE	2005		47					
APPLE	2006		45	-2	-50.4	-0.7	29.5	75.2
APPLE	2007		51	6	-42.9	-0.1	70.4	258.6
APPLE	2008		60	9	-56.9	-24.4	7.1	505.9
APPLE	2009		83	23	-78.2	-10.6	20.6	130.8
APPLE	2010		88	5	-28.4	-3.1	21.2	80.3
APPLE	2011		102	14	-52.7	-7.7	22.6	108.8
APPLE	2005		33					
APPLE	2006		38	5	-42.8	0.6	27.2	112.8
APPLE	2007		46	8	-16.4	-0.7	37.7	83.6
APPLE	2008		42	-4	-41.9	-12.2	6.1	74.4
APPLE	2009		40	-2	-14.3	0.1	26.1	78.0
APPLE	2010		48	8	-29.3	-1.1	30.0	80.0
APPLE	2011		53	5	-22.1	1.5	23.6	68.8
APPLE	2005		40					
APPLE	2006		54	14	-27.9	-3.6	6.8	155.6
APPLE	2007		63	9	-26.5	3.0	57.8	115.9

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees --(Count)--	Change from Previous Year --(Count)--	Percent Change in Total Compensation from Prior Year --(Percent)-- Minimum	25th Percentile	75th Percentile	Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2008		73	10	-49.2	-26.4	20.8	50.7
APPLE	2009		79	6	-49.7	-10.0	27.8	89.9
APPLE	2010		78	-1	-47.0	-2.9	23.7	68.0
APPLE	2011		88	10	-32.6	-3.0	23.6	162.1
APPLE	2005		26					
APPLE	2006		30	4	-22.8	-1.5	38.7	84.5
APPLE	2007		38	8	-42.5	6.0	81.3	226.4
APPLE	2008		38	0	-64.8	-41.2	6.5	199.2
APPLE	2009		44	6	-69.5	-6.5	23.1	41.8
APPLE	2010		45	1	-33.7	-5.2	34.7	157.1
APPLE	2011		39	-6	-41.6	-2.7	11.3	78.1
APPLE	2001		10					
APPLE	2002		16	6	-39.9	-38.7	-5.9	32.4
APPLE	2003		19	3	-43.8	-40.8	7.7	34.0
APPLE	2004		27	8	-15.7	-3.5	13.7	42.9
APPLE	2005		1	-26				
APPLE	2001		14					
APPLE	2002		23	9	-34.7	-28.0	-14.9	-2.4
APPLE	2003		22	-1	-50.2	-28.7	2.1	14.7
APPLE	2004		36	14	-11.2	-2.3	8.9	50.6
APPLE	2005		1	-35				
APPLE	2005		126					
APPLE	2006		129	3	-14.3	2.5	10.1	111.6
APPLE	2007		113	-16	-27.1	2.4	9.1	93.6
APPLE	2008		109	-4	-35.9	2.0	7.4	63.3
APPLE	2009		95	-14	-30.5	2.2	8.2	83.2
APPLE	2010		72	-23	-53.4	1.7	6.9	53.6
APPLE	2011		2	-70	0.0	0.0	0.6	0.6
APPLE	2005		94					
APPLE	2006		133	39	-25.5	-13.5	11.7	57.4
APPLE	2007		154	21	-32.7	-1.2	26.3	92.8
APPLE	2008		183	29	-50.6	-12.5	10.7	114.5
APPLE	2009		197	14	-48.9	-2.3	27.5	86.2
APPLE	2010		255	58	-75.7	-1.7	27.6	103.9
APPLE	2011		288	33	-59.5	-22.0	16.3	189.3

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
Employer	Year	Job Title	Number of Employees --(Count)--	Change from Previous Year --(Count)--	Minimum	25th Percentile	75th Percentile	Maximum
					--(Percent)--			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2005	[redacted]	33					
APPLE	2006	[redacted]	47	14	-8.4	7.5	30.7	64.7
APPLE	2007	[redacted]	65	18	-39.6	-3.2	74.2	153.6
APPLE	2008	[redacted]	80	15	-60.6	-24.9	5.2	188.7
APPLE	2009	[redacted]	92	12	-65.4	1.8	35.8	80.5
APPLE	2010	[redacted]	106	14	-53.0	-0.4	27.5	146.8
APPLE	2011	[redacted]	126	20	-53.1	-9.3	13.8	106.6
APPLE	2005	[redacted]	14					
APPLE	2006	[redacted]	29	15	-0.7	-0.7	79.4	79.4
APPLE	2007	[redacted]	24	-5	0.8	0.8	4.2	4.2
APPLE	2008	[redacted]	17	-7	3.1	3.5	7.7	11.1
APPLE	2009	[redacted]	3	-14	0.0	0.0	3.0	3.0
APPLE	2010	[redacted]	3	0				
APPLE	2005	[redacted]	111					
APPLE	2006	[redacted]	115	4	-10.9	0.0	12.5	91.8
APPLE	2007	[redacted]	132	17	-22.9	1.2	10.8	123.4
APPLE	2008	[redacted]	163	31	-49.2	3.5	12.2	71.2
APPLE	2009	[redacted]	208	45	-16.3	3.3	12.9	120.0
APPLE	2010	[redacted]	188	-20	-39.0	2.7	13.5	84.7
APPLE	2011	[redacted]	1	-187	5.8	5.8	5.8	5.8
APPLE	2005	[redacted]	279					
APPLE	2006	[redacted]	267	-12	-25.9	-7.8	7.6	106.0
APPLE	2007	[redacted]	316	49	-48.5	-1.1	23.6	174.4
APPLE	2008	[redacted]	350	34	-66.2	-0.8	19.4	188.5
APPLE	2009	[redacted]	431	81	-47.8	-0.4	21.9	352.7
APPLE	2010	[redacted]	548	117	-81.2	0.9	51.0	427.4
APPLE	2011	[redacted]	724	176	-52.6	-14.6	18.6	256.1
APPLE	2005	[redacted]	226					
APPLE	2006	[redacted]	264	38	-61.3	-5.9	21.3	112.2
APPLE	2007	[redacted]	285	21	-43.7	-4.0	41.5	236.1
APPLE	2008	[redacted]	323	38	-57.5	-22.6	6.3	181.6
APPLE	2009	[redacted]	402	79	-78.0	-2.8	24.7	193.1
APPLE	2010	[redacted]	472	70	-67.5	-5.6	27.7	351.5
APPLE	2011	[redacted]	594	122	-56.3	-8.4	21.0	201.5

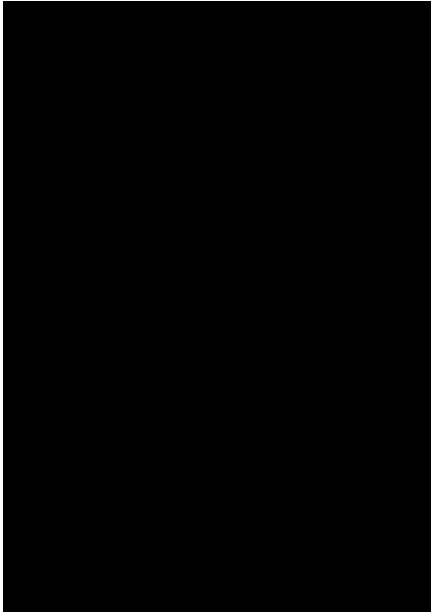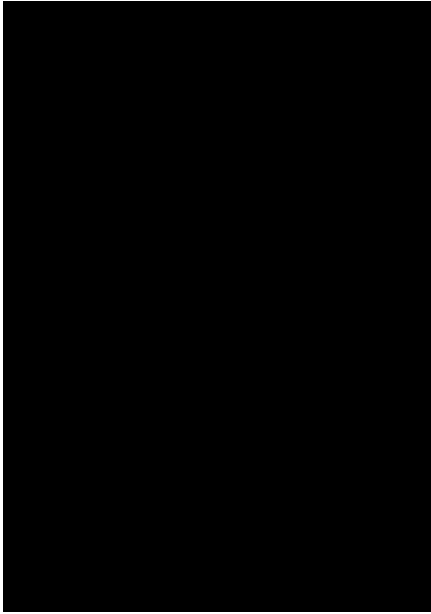Highly Confidential -- Attorneys' Eyes Only

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
			--------(Count)--------	--------(Count)--------	Minimum	25th Percentile	75th Percentile	Maximum
					----------------------(Percent)----------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2005		56					
APPLE	2006		66	10	-39.4	4.6	42.0	111.6
APPLE	2007		78	12	-41.3	1.0	44.1	95.2
APPLE	2008		87	9	-50.6	-26.3	2.4	78.4
APPLE	2009		104	17	-49.1	-0.2	21.6	77.9
APPLE	2010		136	32	-59.7	-4.6	29.0	86.2
APPLE	2011		155	19	-79.0	-0.8	19.7	185.5
APPLE	2005		17					
APPLE	2006		25	8	-15.0	-3.8	23.2	66.6
APPLE	2007		23	-2	-15.0	9.8	74.6	120.8
APPLE	2008		26	3	-49.1	-29.6	11.9	99.4
APPLE	2009		22	-4	-19.6	-6.3	17.1	37.5
APPLE	2010		24	2	-11.9	3.9	21.9	100.7
APPLE	2011		47	23	-45.3	-15.2	15.9	37.7
APPLE	2005		53					
APPLE	2006		58	5	-24.5	0.6	34.1	111.5
APPLE	2007		73	15	-40.7	4.2	57.4	88.1
APPLE	2008		83	10	-62.3	-19.3	11.2	85.0
APPLE	2009		98	15	-32.5	3.9	26.5	72.7
APPLE	2010		118	20	-47.7	-0.6	27.4	306.5
APPLE	2011		143	25	-80.3	-5.4	24.1	158.5
APPLE	2005		44					
APPLE	2006		49	5	-47.2	8.7	41.1	111.1
APPLE	2007		53	4	-39.5	14.7	62.7	149.5
APPLE	2008		57	4	-66.5	-30.7	-10.9	71.6
APPLE	2009		72	15	-58.6	1.8	28.6	104.0
APPLE	2010		82	10	-52.8	-11.2	30.9	378.3
APPLE	2011		90	8	-55.4	1.3	23.5	269.1
APPLE	2005		5					
APPLE	2006		11	6	5.2	24.3	53.3	57.9
APPLE	2007		11	0	-31.5	25.3	60.9	118.0
APPLE	2008		16	5	-33.1	-30.8	-8.7	-0.7
APPLE	2009		18	2	-21.2	-0.7	20.9	66.6
APPLE	2010		23	5	-10.7	22.3	62.1	101.2
APPLE	2011		26	3	-60.9	-14.3	26.9	38.6

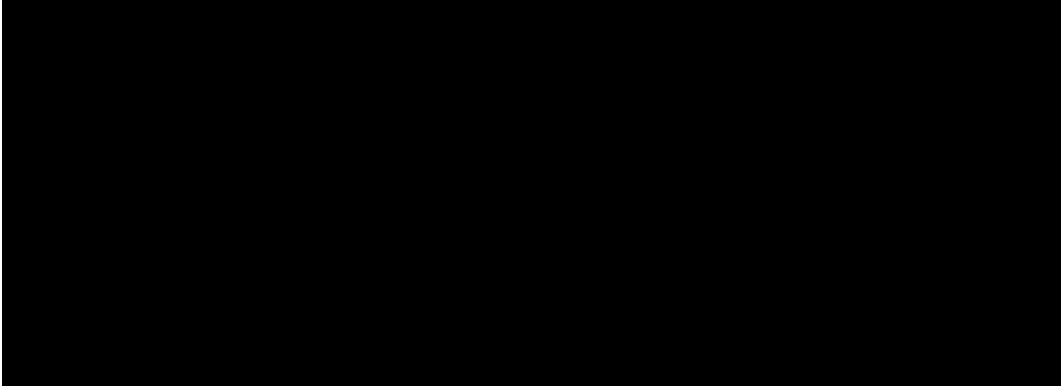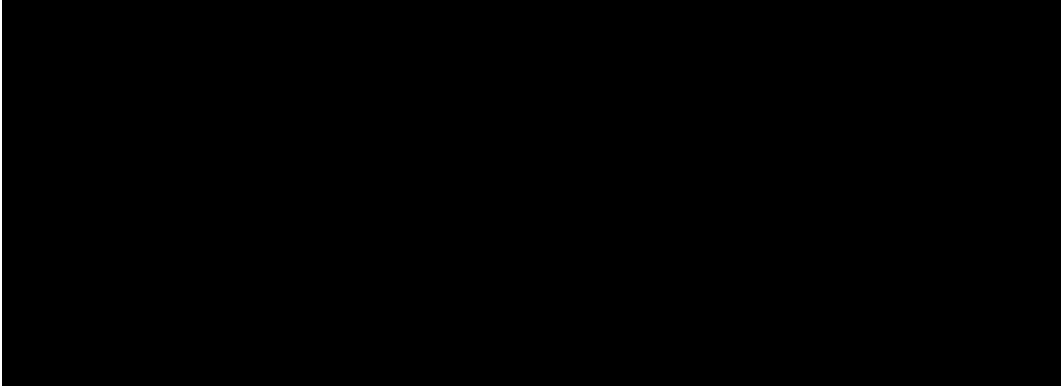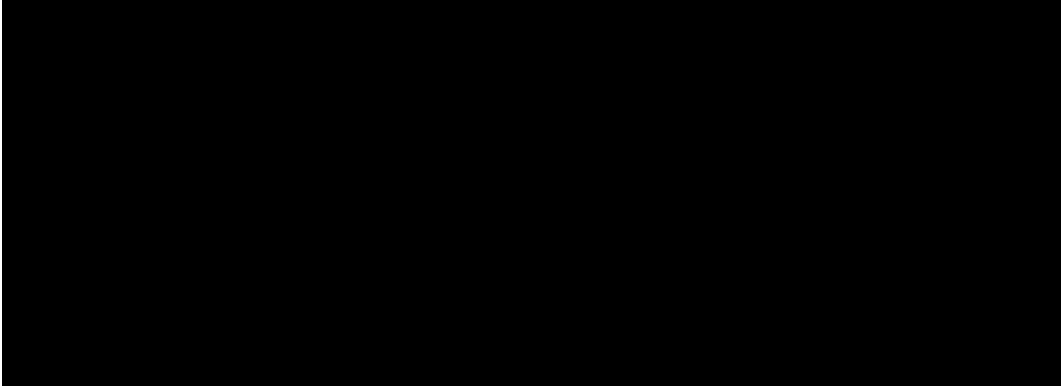Highly Confidential -- Attorneys' Eyes Only

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year (Percent)			
			(Count)	(Count)	Minimum	25th Percentile	75th Percentile	Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2005		9					
APPLE	2006		7	-2	-11.9	-1.7	32.9	46.5
APPLE	2007		7	0	-21.9	-21.9	98.3	98.3
APPLE	2008		15	8	-42.0	-30.9	22.9	163.3
APPLE	2009		20	5	-34.4	3.3	50.7	121.6
APPLE	2010		29	9	-21.6	4.3	24.2	255.8
APPLE	2011		38	9	-36.8	3.1	23.9	42.6
APPLE	2005		22					
APPLE	2006		23	1	-6.3	4.0	69.5	97.4
APPLE	2007		30	7	-44.4	-28.1	83.7	144.3
APPLE	2008		28	-2	-48.6	-31.1	5.9	139.5
APPLE	2009		38	10	-38.4	0.5	29.9	45.6
APPLE	2010		50	12	-32.1	-7.2	30.4	81.1
APPLE	2011		62	12	-27.9	5.8	31.0	96.9
APPLE	2005		27					
APPLE	2006		33	6	0.5	20.7	57.1	98.5
APPLE	2007		37	4	-49.1	2.9	55.1	443.3
APPLE	2008		36	-1	-66.8	-19.2	4.5	36.0
APPLE	2009		44	8	-51.8	4.3	34.0	175.1
APPLE	2010		47	3	-66.4	-15.0	11.9	64.2
APPLE	2011		51	4	-58.7	9.8	40.0	108.3
APPLE	2005		26					
APPLE	2006		27	1	-8.6	5.3	47.9	90.6
APPLE	2007		36	9	-43.7	-11.0	91.5	128.5
APPLE	2008		41	5	-41.2	-12.6	11.3	173.8
APPLE	2009		33	-8	-38.7	5.0	31.4	66.6
APPLE	2010		38	5	-50.3	-2.9	27.9	91.5
APPLE	2011		43	5	-25.1	-7.1	25.7	77.3
APPLE	2005		21					
APPLE	2006		28	7	-12.0	10.9	80.9	123.3
APPLE	2007		26	-2	-44.6	-4.2	65.6	245.4
APPLE	2008		25	-1	-51.6	-22.7	6.5	63.3
APPLE	2009		30	5	-44.9	0.5	25.8	56.8
APPLE	2010		32	2	-10.3	7.0	47.9	101.6
APPLE	2011		31	-1	-12.1	-1.7	19.1	33.3

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

					Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title	Number of Employees	Change from Previous Year		(Percent)		
			--(Count)--	--(Count)--				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2005		8					
APPLE	2006		6	-2	2.3	2.6	8.9	15.2
APPLE	2007		7	1	-14.3	3.0	6.0	72.6
APPLE	2008		7	0	-36.6	-29.5	3.8	28.1
APPLE	2009		7	0	-3.2	-0.4	5.8	7.3
APPLE	2010		38	31	3.1	4.2	33.5	49.6
APPLE	2011		61	23	-55.0	-3.0	60.5	137.7
APPLE	2005		4					
APPLE	2006		7	3	-24.4	-24.4	-24.4	-24.4
APPLE	2007		9	2	-20.7	32.2	82.2	98.2
APPLE	2008		9	0	-52.2	-25.5	10.8	133.1
APPLE	2009		6	-3	-29.8	-1.2	20.4	30.0
APPLE	2010		36	30	2.8	6.2	27.6	60.9
APPLE	2011		54	18	-59.9	-8.5	30.6	210.1
APPLE	2005		46	0	-0.2	0.2	18.7	48.0
APPLE	2006		46	9	-26.3	0.0	5.5	68.4
APPLE	2007		55	3	-36.6	2.0	39.9	103.3
APPLE	2008		58	9	-38.5	-21.3	20.6	76.7
APPLE	2009		67	6	-32.3	-3.2	26.2	91.4
APPLE	2010		73	13	-43.7	-9.4	10.1	82.4
APPLE	2011		86					
APPLE	2001		10					
APPLE	2002		10	0	-27.3	-7.8	-1.3	-1.1
APPLE	2003		9	-1	4.0	5.0	12.7	14.4
APPLE	2004		7	-2	-7.4	-6.4	5.3	12.3
APPLE	2005		6	-1				
APPLE	2006		9	3	-25.2	-23.2	3.0	4.0
APPLE	2007		19	10	-13.9	0.2	3.2	3.2
APPLE	2008		30	11	-35.5	-19.0	22.6	40.1
APPLE	2009		32	2	-37.0	-2.3	17.2	71.3
APPLE	2010		11	-21	-38.8	-9.6	-0.9	94.7
APPLE	2011		13	2	-31.1	0.0	6.7	51.0
APPLE	2001		55					
APPLE	2002		54	-1	-33.7	-6.9	-1.6	0.4
APPLE	2003		49	-5	-26.9	4.3	21.8	62.0
APPLE	2004		4	-45	-5.6	-5.6	4.6	4.6

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--------(Count)--------		----------------------------(Percent)----------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2001		44					
APPLE	2002		45	1	-29.7	-9.6	-1.2	33.6
APPLE	2003		55	10	-26.1	4.5	14.4	32.0
APPLE	2004		7	-48	-7.3	-5.8	3.1	4.1
APPLE	2005		18					
APPLE	2006		20	2	-14.8	-2.6	2.7	13.1
APPLE	2007		19	-1	-36.5	3.0	50.0	108.2
APPLE	2008		21	2	-31.6	-23.4	31.9	93.5
APPLE	2009		22	1	-45.6	3.0	40.5	59.5
APPLE	2010		25	3	-35.9	1.0	13.6	61.2
APPLE	2011		21	-4	-40.6	-0.4	29.0	116.0
APPLE	2001		26					
APPLE	2002		24	-2	-35.5	-14.3	12.7	41.6
APPLE	2003		28	4	-15.8	-1.1	7.6	36.6
APPLE	2004		30	2	-20.0	-3.7	7.1	21.2
APPLE	2005		25					
APPLE	2006		22	-3	4.0	7.9	12.1	57.8
APPLE	2007		22	0	-7.7	-5.1	-0.7	4.0
APPLE	2008		30	8	1.6	3.0	45.3	83.3
APPLE	2009		53	23	-11.3	2.6	15.5	127.0
APPLE	2010		24	-29	-49.9	0.9	23.1	164.9
APPLE	2011		5	-19	-48.8	-3.3	4.0	5.3
APPLE	2005		6					
APPLE	2006		11	5	4.7	5.1	6.8	7.9
APPLE	2007		20	9	-23.0	-2.5	4.1	70.0
APPLE	2008		31	11	-38.9	-12.8	29.4	96.2
APPLE	2009		46	15	-40.7	-16.5	26.2	118.4
APPLE	2010		37	-9	-37.1	-9.0	45.5	69.8
APPLE	2011		41	4	-39.5	2.9	40.1	129.4
APPLE	2005		1					
APPLE	2006		5	4	47.0	47.0	47.0	47.0
APPLE	2007		10	5	-8.8	-3.8	13.9	25.7
APPLE	2008		12	2	-17.1	-16.8	21.7	52.9
APPLE	2009		27	15	-59.3	-50.4	8.4	46.0

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year		Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		---------------------(Percent)---------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
APPLE	2010		22	-5	-36.3	-33.0	18.9	34.8
APPLE	2011		26	4	-52.0	-28.6	33.9	137.3
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2010							
GOOGLE	2004							
GOOGLE	2005							

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

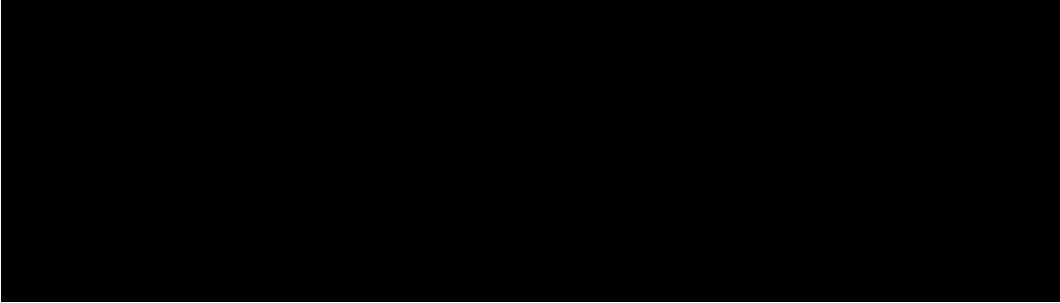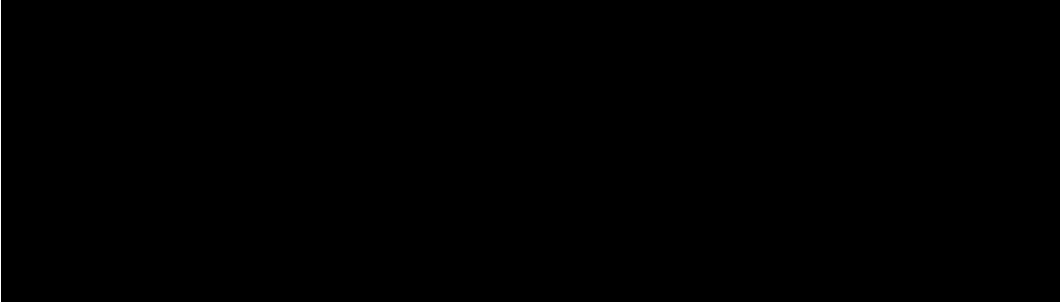| Employer | Year | Job Title | Number of Employees | Change from Previous Year | Percent Change in Total Compensation from Prior Year | | | |
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2002							
GOOGLE	2003							

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		-------------------------(Percent)-------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							

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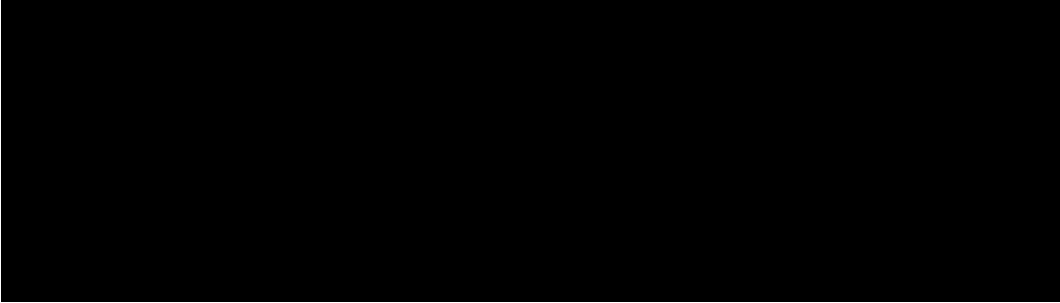
Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			------(Count)------		------(Percent)------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees ------(Count)------	Change from Previous Year ------(Count)------	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
					------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					\multicolumn — Percent Change in Total Compensation from Prior Year			
			------(Count)------	------(Count)------	------(Percent)------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------	------(Count)------	------------------------(Percent)------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			------(Count)------		-------------------(Percent)-------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		--------------------(Percent)--------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			----(Count)----		--------------------(Percent)--------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--		--(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------					
						Percent Change in Total Compensation from Prior Year		
					----------------------(Percent)----------------------			
(a)	**(b)**	**(c)**	**(d)**	**(e)**	**(f)**	**(g)**	**(h)**	**(i)**
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

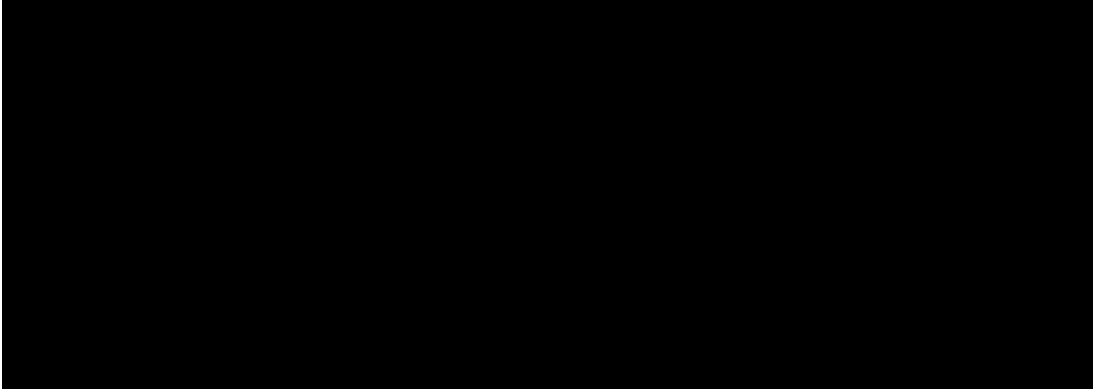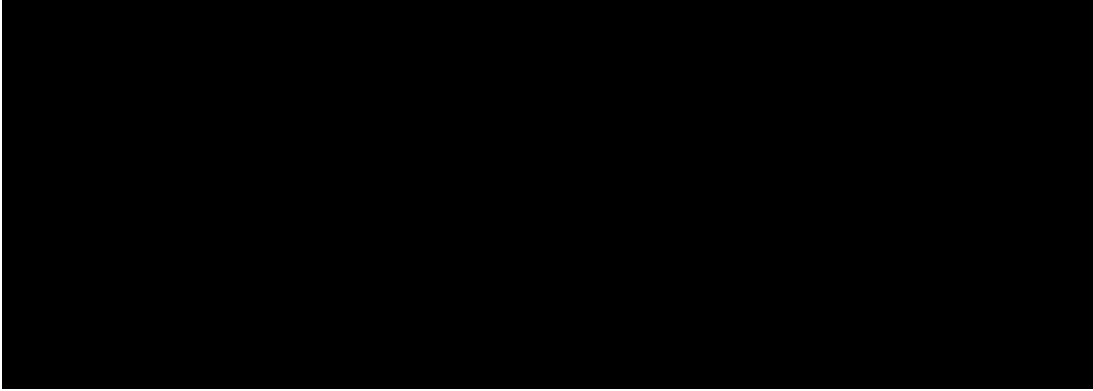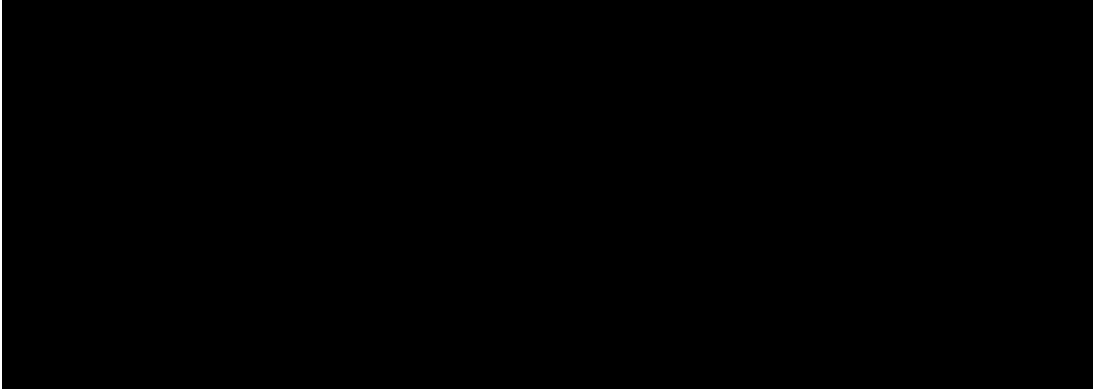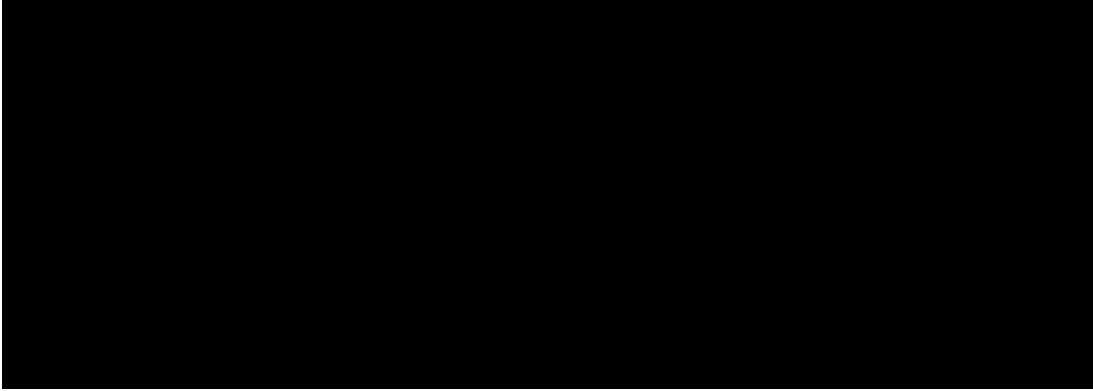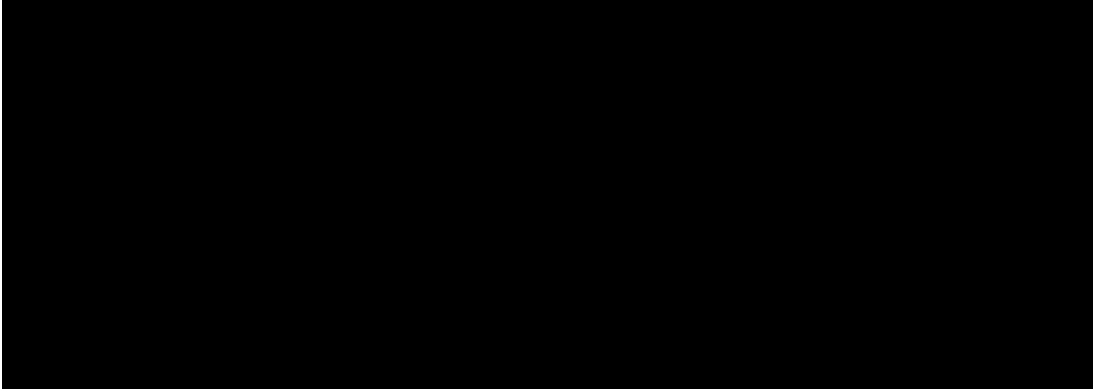| Employer | Year | Job Title | Number of Employees | Change from Previous Year | Percent Change in Total Compensation from Prior Year | | | |
					Minimum	25th Percentile	75th Percentile	Maximum
			--------(Count)--------		----------------------------(Percent)----------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2011							
GOOGLE	2001							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			------(Count)------		----------(Percent)----------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
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GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2001							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			------(Count)------		------------------------(Percent)------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
GOOGLE	2002							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
GOOGLE	2003							
GOOGLE	2004							
GOOGLE	2005							
GOOGLE	2006							
GOOGLE	2007							
GOOGLE	2008							
GOOGLE	2009							
GOOGLE	2010							
GOOGLE	2011							
INTEL	2001	ANALOG_ENGINEER_5						
INTEL	2002	ANALOG_ENGINEER_5						
INTEL	2003	ANALOG_ENGINEER_5						
INTEL	2004	ANALOG_ENGINEER_5						
INTEL	2005	ANALOG_ENGINEER_5						
INTEL	2006	ANALOG_ENGINEER_5						
INTEL	2007	ANALOG_ENGINEER_5						
INTEL	2008	ANALOG_ENGINEER_5						
INTEL	2009	ANALOG_ENGINEER_5						

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		----------(Percent)----------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	ANALOG_ENGINEER_5						
INTEL	2011	ANALOG_ENGINEER_5						
INTEL	2001	ANALOG_ENGINEER_6						
INTEL	2002	ANALOG_ENGINEER_6						
INTEL	2003	ANALOG_ENGINEER_6						
INTEL	2004	ANALOG_ENGINEER_6						
INTEL	2005	ANALOG_ENGINEER_6						
INTEL	2006	ANALOG_ENGINEER_6						
INTEL	2007	ANALOG_ENGINEER_6						
INTEL	2008	ANALOG_ENGINEER_6						
INTEL	2009	ANALOG_ENGINEER_6						
INTEL	2010	ANALOG_ENGINEER_6						
INTEL	2011	ANALOG_ENGINEER_6						
INTEL	2001	ANALOG_ENGINEER_7						
INTEL	2002	ANALOG_ENGINEER_7						
INTEL	2003	ANALOG_ENGINEER_7						
INTEL	2004	ANALOG_ENGINEER_7						
INTEL	2005	ANALOG_ENGINEER_7						
INTEL	2006	ANALOG_ENGINEER_7						
INTEL	2007	ANALOG_ENGINEER_7						
INTEL	2008	ANALOG_ENGINEER_7						
INTEL	2009	ANALOG_ENGINEER_7						
INTEL	2010	ANALOG_ENGINEER_7						
INTEL	2011	ANALOG_ENGINEER_7						
INTEL	2001	ANALOG_ENGINEER_8						
INTEL	2002	ANALOG_ENGINEER_8						
INTEL	2003	ANALOG_ENGINEER_8						
INTEL	2004	ANALOG_ENGINEER_8						
INTEL	2005	ANALOG_ENGINEER_8						
INTEL	2006	ANALOG_ENGINEER_8						
INTEL	2007	ANALOG_ENGINEER_8						
INTEL	2008	ANALOG_ENGINEER_8						
INTEL	2009	ANALOG_ENGINEER_8						
INTEL	2010	ANALOG_ENGINEER_8						
INTEL	2011	ANALOG_ENGINEER_8						
INTEL	2001	ANALOG_ENGINEER_9						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----	----(Count)----		----------------(Percent)----------------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	ANALOG_ENGINEER_9						
INTEL	2003	ANALOG_ENGINEER_9						
INTEL	2004	ANALOG_ENGINEER_9						
INTEL	2005	ANALOG_ENGINEER_9						
INTEL	2006	ANALOG_ENGINEER_9						
INTEL	2007	ANALOG_ENGINEER_9						
INTEL	2008	ANALOG_ENGINEER_9						
INTEL	2009	ANALOG_ENGINEER_9						
INTEL	2010	ANALOG_ENGINEER_9						
INTEL	2011	ANALOG_ENGINEER_9						
INTEL	2002	APPLICATION_DEVELOPER_3						
INTEL	2003	APPLICATION_DEVELOPER_3						
INTEL	2004	APPLICATION_DEVELOPER_3						
INTEL	2005	APPLICATION_DEVELOPER_3						
INTEL	2006	APPLICATION_DEVELOPER_3						
INTEL	2007	APPLICATION_DEVELOPER_3						
INTEL	2008	APPLICATION_DEVELOPER_3						
INTEL	2009	APPLICATION_DEVELOPER_3						
INTEL	2010	APPLICATION_DEVELOPER_3						
INTEL	2011	APPLICATION_DEVELOPER_3						
INTEL	2002	APPLICATION_DEVELOPER_5						
INTEL	2003	APPLICATION_DEVELOPER_5						
INTEL	2004	APPLICATION_DEVELOPER_5						
INTEL	2005	APPLICATION_DEVELOPER_5						
INTEL	2006	APPLICATION_DEVELOPER_5						
INTEL	2007	APPLICATION_DEVELOPER_5						
INTEL	2008	APPLICATION_DEVELOPER_5						
INTEL	2009	APPLICATION_DEVELOPER_5						
INTEL	2010	APPLICATION_DEVELOPER_5						
INTEL	2011	APPLICATION_DEVELOPER_5						
INTEL	2002	APPLICATION_DEVELOPER_6						
INTEL	2003	APPLICATION_DEVELOPER_6						
INTEL	2004	APPLICATION_DEVELOPER_6						
INTEL	2005	APPLICATION_DEVELOPER_6						
INTEL	2006	APPLICATION_DEVELOPER_6						
INTEL	2007	APPLICATION_DEVELOPER_6						
INTEL	2008	APPLICATION_DEVELOPER_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees ---(Count)---	Change from Previous Year ---(Count)---	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
					----------------(Percent)----------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2009	APPLICATION_DEVELOPER_6						
INTEL	2010	APPLICATION_DEVELOPER_6						
INTEL	2011	APPLICATION_DEVELOPER_6						
INTEL	2002	APPLICATION_DEVELOPER_7						
INTEL	2003	APPLICATION_DEVELOPER_7						
INTEL	2004	APPLICATION_DEVELOPER_7						
INTEL	2005	APPLICATION_DEVELOPER_7						
INTEL	2006	APPLICATION_DEVELOPER_7						
INTEL	2007	APPLICATION_DEVELOPER_7						
INTEL	2008	APPLICATION_DEVELOPER_7						
INTEL	2009	APPLICATION_DEVELOPER_7						
INTEL	2010	APPLICATION_DEVELOPER_7						
INTEL	2011	APPLICATION_DEVELOPER_7						
INTEL	2002	APPLICATION_DEVELOPER_8						
INTEL	2003	APPLICATION_DEVELOPER_8						
INTEL	2004	APPLICATION_DEVELOPER_8						
INTEL	2005	APPLICATION_DEVELOPER_8						
INTEL	2006	APPLICATION_DEVELOPER_8						
INTEL	2007	APPLICATION_DEVELOPER_8						
INTEL	2008	APPLICATION_DEVELOPER_8						
INTEL	2009	APPLICATION_DEVELOPER_8						
INTEL	2010	APPLICATION_DEVELOPER_8						
INTEL	2011	APPLICATION_DEVELOPER_8						
INTEL	2004	AUTOMATION_ENGINEER_3						
INTEL	2005	AUTOMATION_ENGINEER_3						
INTEL	2006	AUTOMATION_ENGINEER_3						
INTEL	2007	AUTOMATION_ENGINEER_3						
INTEL	2008	AUTOMATION_ENGINEER_3						
INTEL	2009	AUTOMATION_ENGINEER_3						
INTEL	2010	AUTOMATION_ENGINEER_3						
INTEL	2011	AUTOMATION_ENGINEER_3						
INTEL	2004	AUTOMATION_ENGINEER_5						
INTEL	2005	AUTOMATION_ENGINEER_5						
INTEL	2006	AUTOMATION_ENGINEER_5						
INTEL	2007	AUTOMATION_ENGINEER_5						
INTEL	2008	AUTOMATION_ENGINEER_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			------(Count)------			------(Percent)------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2009	AUTOMATION_ENGINEER_5						
INTEL	2010	AUTOMATION_ENGINEER_5						
INTEL	2011	AUTOMATION_ENGINEER_5						
INTEL	2001	AUTOMATION_ENGINEER_6						
INTEL	2002	AUTOMATION_ENGINEER_6						
INTEL	2003	AUTOMATION_ENGINEER_6						
INTEL	2004	AUTOMATION_ENGINEER_6						
INTEL	2005	AUTOMATION_ENGINEER_6						
INTEL	2006	AUTOMATION_ENGINEER_6						
INTEL	2007	AUTOMATION_ENGINEER_6						
INTEL	2008	AUTOMATION_ENGINEER_6						
INTEL	2009	AUTOMATION_ENGINEER_6						
INTEL	2010	AUTOMATION_ENGINEER_6						
INTEL	2011	AUTOMATION_ENGINEER_6						
INTEL	2004	AUTOMATION_ENGINEER_7						
INTEL	2005	AUTOMATION_ENGINEER_7						
INTEL	2006	AUTOMATION_ENGINEER_7						
INTEL	2007	AUTOMATION_ENGINEER_7						
INTEL	2008	AUTOMATION_ENGINEER_7						
INTEL	2009	AUTOMATION_ENGINEER_7						
INTEL	2010	AUTOMATION_ENGINEER_7						
INTEL	2011	AUTOMATION_ENGINEER_7						
INTEL	2004	AUTOMATION_ENGINEER_8						
INTEL	2005	AUTOMATION_ENGINEER_8						
INTEL	2006	AUTOMATION_ENGINEER_8						
INTEL	2007	AUTOMATION_ENGINEER_8						
INTEL	2008	AUTOMATION_ENGINEER_8						
INTEL	2009	AUTOMATION_ENGINEER_8						
INTEL	2010	AUTOMATION_ENGINEER_8						
INTEL	2011	AUTOMATION_ENGINEER_8						
INTEL	2005	BIOS_ENGINEER_6						
INTEL	2006	BIOS_ENGINEER_6						
INTEL	2007	BIOS_ENGINEER_6						
INTEL	2008	BIOS_ENGINEER_6						
INTEL	2009	BIOS_ENGINEER_6						
INTEL	2010	BIOS_ENGINEER_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
			--(Count)--	--(Count)--			--(Percent)--	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2011	BIOS_ENGINEER_6						
INTEL	2005	BIOS_ENGINEER_7						
INTEL	2006	BIOS_ENGINEER_7						
INTEL	2007	BIOS_ENGINEER_7						
INTEL	2008	BIOS_ENGINEER_7						
INTEL	2009	BIOS_ENGINEER_7						
INTEL	2010	BIOS_ENGINEER_7						
INTEL	2011	BIOS_ENGINEER_7						
INTEL	2005	BIOS_ENGINEER_8						
INTEL	2006	BIOS_ENGINEER_8						
INTEL	2007	BIOS_ENGINEER_8						
INTEL	2008	BIOS_ENGINEER_8						
INTEL	2009	BIOS_ENGINEER_8						
INTEL	2010	BIOS_ENGINEER_8						
INTEL	2011	BIOS_ENGINEER_8						
INTEL	2001	CAD_ENGINEER_3						
INTEL	2002	CAD_ENGINEER_3						
INTEL	2003	CAD_ENGINEER_3						
INTEL	2004	CAD_ENGINEER_3						
INTEL	2005	CAD_ENGINEER_3						
INTEL	2006	CAD_ENGINEER_3						
INTEL	2007	CAD_ENGINEER_3						
INTEL	2008	CAD_ENGINEER_3						
INTEL	2009	CAD_ENGINEER_3						
INTEL	2010	CAD_ENGINEER_3						
INTEL	2011	CAD_ENGINEER_3						
INTEL	2001	CAD_ENGINEER_5						
INTEL	2002	CAD_ENGINEER_5						
INTEL	2003	CAD_ENGINEER_5						
INTEL	2004	CAD_ENGINEER_5						
INTEL	2005	CAD_ENGINEER_5						
INTEL	2006	CAD_ENGINEER_5						
INTEL	2007	CAD_ENGINEER_5						
INTEL	2008	CAD_ENGINEER_5						
INTEL	2009	CAD_ENGINEER_5						
INTEL	2010	CAD_ENGINEER_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		--------------------(Percent)--------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2011	CAD_ENGINEER_5						
INTEL	2001	CAD_ENGINEER_6						
INTEL	2002	CAD_ENGINEER_6						
INTEL	2003	CAD_ENGINEER_6						
INTEL	2004	CAD_ENGINEER_6						
INTEL	2005	CAD_ENGINEER_6						
INTEL	2006	CAD_ENGINEER_6						
INTEL	2007	CAD_ENGINEER_6						
INTEL	2008	CAD_ENGINEER_6						
INTEL	2009	CAD_ENGINEER_6						
INTEL	2010	CAD_ENGINEER_6						
INTEL	2011	CAD_ENGINEER_6						
INTEL	2001	CAD_ENGINEER_7						
INTEL	2002	CAD_ENGINEER_7						
INTEL	2003	CAD_ENGINEER_7						
INTEL	2004	CAD_ENGINEER_7						
INTEL	2005	CAD_ENGINEER_7						
INTEL	2006	CAD_ENGINEER_7						
INTEL	2007	CAD_ENGINEER_7						
INTEL	2008	CAD_ENGINEER_7						
INTEL	2009	CAD_ENGINEER_7						
INTEL	2010	CAD_ENGINEER_7						
INTEL	2011	CAD_ENGINEER_7						
INTEL	2001	CAD_ENGINEER_8						
INTEL	2002	CAD_ENGINEER_8						
INTEL	2003	CAD_ENGINEER_8						
INTEL	2004	CAD_ENGINEER_8						
INTEL	2005	CAD_ENGINEER_8						
INTEL	2006	CAD_ENGINEER_8						
INTEL	2007	CAD_ENGINEER_8						
INTEL	2008	CAD_ENGINEER_8						
INTEL	2009	CAD_ENGINEER_8						
INTEL	2010	CAD_ENGINEER_8						
INTEL	2011	CAD_ENGINEER_8						
INTEL	2001	CAD_ENGINEER_9						
INTEL	2002	CAD_ENGINEER_9						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			--------(Count)--------				(Percent)	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2003	CAD_ENGINEER_9						
INTEL	2004	CAD_ENGINEER_9						
INTEL	2005	CAD_ENGINEER_9						
INTEL	2006	CAD_ENGINEER_9						
INTEL	2007	CAD_ENGINEER_9						
INTEL	2008	CAD_ENGINEER_9						
INTEL	2009	CAD_ENGINEER_9						
INTEL	2010	CAD_ENGINEER_9						
INTEL	2011	CAD_ENGINEER_9						
INTEL	2004	CIRCUIT_DESIGN_ENGINEER_7						
INTEL	2005	CIRCUIT_DESIGN_ENGINEER_7						
INTEL	2004	CIRCUIT_DESIGN_ENGINEER_8						
INTEL	2005	CIRCUIT_DESIGN_ENGINEER_8						
INTEL	2001	COMPONENT_DESIGN_ENGR_10						
INTEL	2002	COMPONENT_DESIGN_ENGR_10						
INTEL	2004	COMPONENT_DESIGN_ENGR_10						
INTEL	2005	COMPONENT_DESIGN_ENGR_10						
INTEL	2006	COMPONENT_DESIGN_ENGR_10						
INTEL	2007	COMPONENT_DESIGN_ENGR_10						
INTEL	2008	COMPONENT_DESIGN_ENGR_10						
INTEL	2009	COMPONENT_DESIGN_ENGR_10						
INTEL	2010	COMPONENT_DESIGN_ENGR_10						
INTEL	2011	COMPONENT_DESIGN_ENGR_10						
INTEL	2001	COMPONENT_DESIGN_ENGR_3						
INTEL	2002	COMPONENT_DESIGN_ENGR_3						
INTEL	2003	COMPONENT_DESIGN_ENGR_3						
INTEL	2004	COMPONENT_DESIGN_ENGR_3						
INTEL	2005	COMPONENT_DESIGN_ENGR_3						
INTEL	2006	COMPONENT_DESIGN_ENGR_3						
INTEL	2007	COMPONENT_DESIGN_ENGR_3						
INTEL	2008	COMPONENT_DESIGN_ENGR_3						
INTEL	2009	COMPONENT_DESIGN_ENGR_3						
INTEL	2010	COMPONENT_DESIGN_ENGR_3						
INTEL	2011	COMPONENT_DESIGN_ENGR_3						
INTEL	2001	COMPONENT_DESIGN_ENGR_5						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees ----(Count)----	Change from Previous Year ----(Count)----	Percent Change in Total Compensation from Prior Year			
					Minimum ----(Percent)----	25th Percentile	75th Percentile	Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	COMPONENT_DESIGN_ENGR_5						
INTEL	2003	COMPONENT_DESIGN_ENGR_5						
INTEL	2004	COMPONENT_DESIGN_ENGR_5						
INTEL	2005	COMPONENT_DESIGN_ENGR_5						
INTEL	2006	COMPONENT_DESIGN_ENGR_5						
INTEL	2007	COMPONENT_DESIGN_ENGR_5						
INTEL	2008	COMPONENT_DESIGN_ENGR_5						
INTEL	2009	COMPONENT_DESIGN_ENGR_5						
INTEL	2010	COMPONENT_DESIGN_ENGR_5						
INTEL	2011	COMPONENT_DESIGN_ENGR_5						
INTEL	2001	COMPONENT_DESIGN_ENGR_6						
INTEL	2002	COMPONENT_DESIGN_ENGR_6						
INTEL	2003	COMPONENT_DESIGN_ENGR_6						
INTEL	2004	COMPONENT_DESIGN_ENGR_6						
INTEL	2005	COMPONENT_DESIGN_ENGR_6						
INTEL	2006	COMPONENT_DESIGN_ENGR_6						
INTEL	2007	COMPONENT_DESIGN_ENGR_6						
INTEL	2008	COMPONENT_DESIGN_ENGR_6						
INTEL	2009	COMPONENT_DESIGN_ENGR_6						
INTEL	2010	COMPONENT_DESIGN_ENGR_6						
INTEL	2011	COMPONENT_DESIGN_ENGR_6						
INTEL	2001	COMPONENT_DESIGN_ENGR_7						
INTEL	2002	COMPONENT_DESIGN_ENGR_7						
INTEL	2003	COMPONENT_DESIGN_ENGR_7						
INTEL	2004	COMPONENT_DESIGN_ENGR_7						
INTEL	2005	COMPONENT_DESIGN_ENGR_7						
INTEL	2006	COMPONENT_DESIGN_ENGR_7						
INTEL	2007	COMPONENT_DESIGN_ENGR_7						
INTEL	2008	COMPONENT_DESIGN_ENGR_7						
INTEL	2009	COMPONENT_DESIGN_ENGR_7						
INTEL	2010	COMPONENT_DESIGN_ENGR_7						
INTEL	2011	COMPONENT_DESIGN_ENGR_7						
INTEL	2001	COMPONENT_DESIGN_ENGR_8						
INTEL	2002	COMPONENT_DESIGN_ENGR_8						
INTEL	2003	COMPONENT_DESIGN_ENGR_8						
INTEL	2004	COMPONENT_DESIGN_ENGR_8						
INTEL	2005	COMPONENT_DESIGN_ENGR_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
				----(Count)----	\multicolumn{4}{c}{Percent Change in Total Compensation from Prior Year}
						----(Percent)----		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2006	COMPONENT_DESIGN_ENGR_8						
INTEL	2007	COMPONENT_DESIGN_ENGR_8						
INTEL	2008	COMPONENT_DESIGN_ENGR_8						
INTEL	2009	COMPONENT_DESIGN_ENGR_8						
INTEL	2010	COMPONENT_DESIGN_ENGR_8						
INTEL	2011	COMPONENT_DESIGN_ENGR_8						
INTEL	2001	COMPONENT_DESIGN_ENGR_9						
INTEL	2002	COMPONENT_DESIGN_ENGR_9						
INTEL	2003	COMPONENT_DESIGN_ENGR_9						
INTEL	2004	COMPONENT_DESIGN_ENGR_9						
INTEL	2005	COMPONENT_DESIGN_ENGR_9						
INTEL	2006	COMPONENT_DESIGN_ENGR_9						
INTEL	2007	COMPONENT_DESIGN_ENGR_9						
INTEL	2008	COMPONENT_DESIGN_ENGR_9						
INTEL	2009	COMPONENT_DESIGN_ENGR_9						
INTEL	2010	COMPONENT_DESIGN_ENGR_9						
INTEL	2011	COMPONENT_DESIGN_ENGR_9						
INTEL	2004	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2005	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2006	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2007	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2008	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2009	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2010	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2011	CONSTRUCTION_PROJECT_MANAGER_5						
INTEL	2004	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2005	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2006	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2007	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2008	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2009	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2010	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2011	CONSTRUCTION_PROJECT_MANAGER_6						
INTEL	2004	CONSTRUCTION_PROJECT_MANAGER_7						
INTEL	2005	CONSTRUCTION_PROJECT_MANAGER_7						
INTEL	2006	CONSTRUCTION_PROJECT_MANAGER_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----			Percent Change in Total Compensation from Prior Year		
				----(Count)----		--------(Percent)--------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2007	CONSTRUCTION_PROJECT_MANAGER_7						
INTEL	2008	CONSTRUCTION_PROJECT_MANAGER_7						
INTEL	2009	CONSTRUCTION_PROJECT_MANAGER_7						
INTEL	2010	CONSTRUCTION_PROJECT_MANAGER_7						
INTEL	2011	CONSTRUCTION_PROJECT_MANAGER_7						
INTEL	2004	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2005	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2006	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2007	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2008	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2009	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2010	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2011	CONSTRUCTION_PROJECT_MANAGER_8						
INTEL	2004	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2005	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2006	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2007	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2008	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2009	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2010	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2011	CONSTRUCTION_PROJECT_MANAGER_9						
INTEL	2001	CONSULTING_ENGINEER_5						
INTEL	2002	CONSULTING_ENGINEER_5						
INTEL	2003	CONSULTING_ENGINEER_5						
INTEL	2001	CONSULTING_ENGINEER_6						
INTEL	2002	CONSULTING_ENGINEER_6						
INTEL	2003	CONSULTING_ENGINEER_6						
INTEL	2004	CONSULTING_ENGINEER_6						
INTEL	2005	CONSULTING_ENGINEER_6						
INTEL	2006	CONSULTING_ENGINEER_6						
INTEL	2007	CONSULTING_ENGINEER_6						
INTEL	2001	CONSULTING_ENGINEER_7						
INTEL	2002	CONSULTING_ENGINEER_7						
INTEL	2003	CONSULTING_ENGINEER_7						
INTEL	2004	CONSULTING_ENGINEER_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		----(Percent)----			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2005	CONSULTING_ENGINEER_7						
INTEL	2006	CONSULTING_ENGINEER_7						
INTEL	2007	CONSULTING_ENGINEER_7						
INTEL	2008	CONSULTING_ENGINEER_7						
INTEL	2009	CONSULTING_ENGINEER_7						
INTEL	2010	CONSULTING_ENGINEER_7						
INTEL	2001	CONSULTING_ENGINEER_9						
INTEL	2002	CONSULTING_ENGINEER_9						
INTEL	2003	CONSULTING_ENGINEER_9						
INTEL	2004	CONSULTING_ENGINEER_9						
INTEL	2005	CONSULTING_ENGINEER_9						
INTEL	2006	CONSULTING_ENGINEER_9						
INTEL	2007	CONSULTING_ENGINEER_9						
INTEL	2008	CONSULTING_ENGINEER_9						
INTEL	2009	CONSULTING_ENGINEER_9						
INTEL	2002	DATABASE_ADMINISTRATOR_6						
INTEL	2003	DATABASE_ADMINISTRATOR_6						
INTEL	2004	DATABASE_ADMINISTRATOR_6						
INTEL	2005	DATABASE_ADMINISTRATOR_6						
INTEL	2006	DATABASE_ADMINISTRATOR_6						
INTEL	2007	DATABASE_ADMINISTRATOR_6						
INTEL	2008	DATABASE_ADMINISTRATOR_6						
INTEL	2009	DATABASE_ADMINISTRATOR_6						
INTEL	2010	DATABASE_ADMINISTRATOR_6						
INTEL	2011	DATABASE_ADMINISTRATOR_6						
INTEL	2002	DATABASE_ADMINISTRATOR_7						
INTEL	2003	DATABASE_ADMINISTRATOR_7						
INTEL	2004	DATABASE_ADMINISTRATOR_7						
INTEL	2005	DATABASE_ADMINISTRATOR_7						
INTEL	2006	DATABASE_ADMINISTRATOR_7						
INTEL	2007	DATABASE_ADMINISTRATOR_7						
INTEL	2008	DATABASE_ADMINISTRATOR_7						
INTEL	2009	DATABASE_ADMINISTRATOR_7						
INTEL	2010	DATABASE_ADMINISTRATOR_7						
INTEL	2011	DATABASE_ADMINISTRATOR_7						
INTEL	2001	DATA_ANALYST_6						

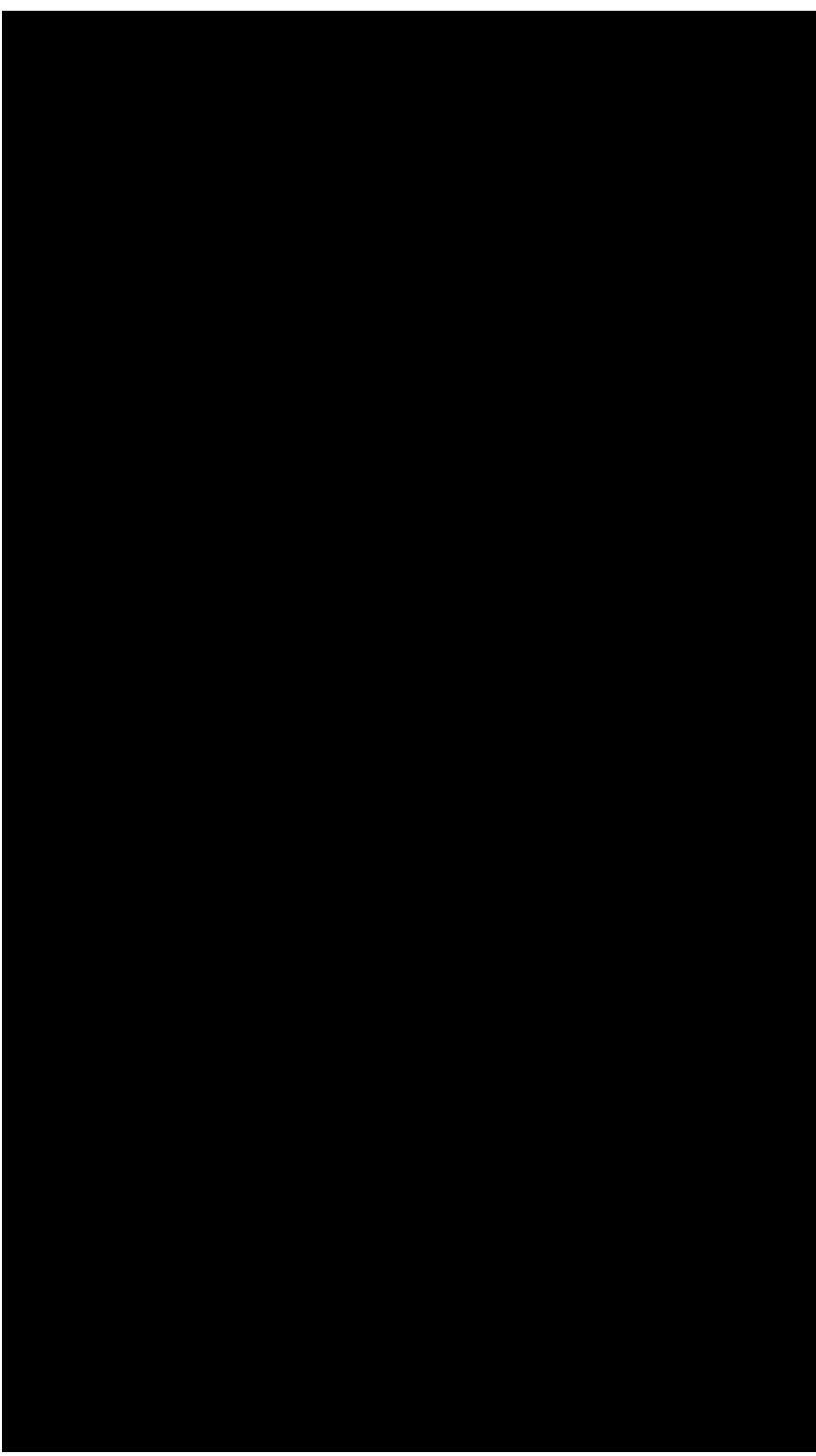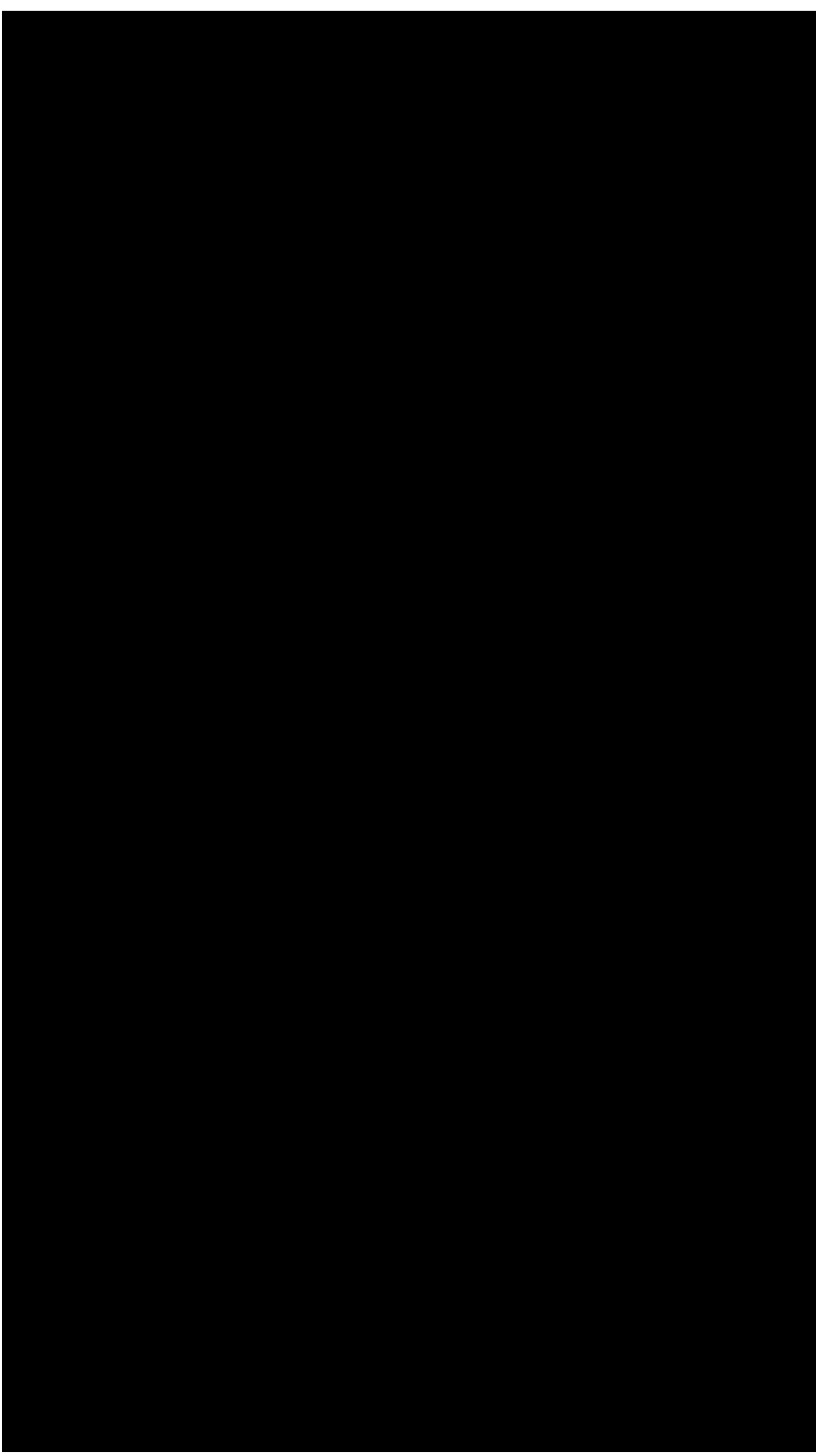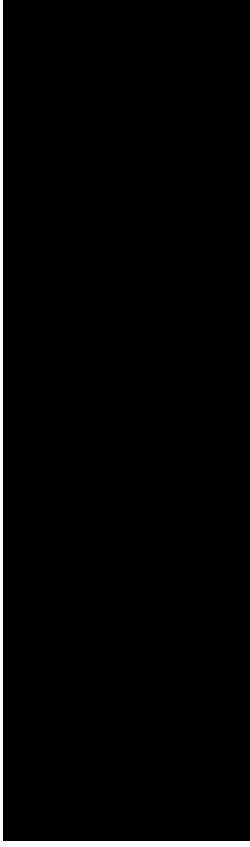Highly Confidential -- Attorneys' Eyes Only

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			(Count)			(Percent)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	DATA_ANALYST_6						
INTEL	2003	DATA_ANALYST_6						
INTEL	2004	DATA_ANALYST_6						
INTEL	2005	DATA_ANALYST_6						
INTEL	2006	DATA_ANALYST_6						
INTEL	2007	DATA_ANALYST_6						
INTEL	2008	DATA_ANALYST_6						
INTEL	2009	DATA_ANALYST_6						
INTEL	2010	DATA_ANALYST_6						
INTEL	2011	DATA_ANALYST_6						
INTEL	2001	DATA_ANALYST_7						
INTEL	2002	DATA_ANALYST_7						
INTEL	2003	DATA_ANALYST_7						
INTEL	2004	DATA_ANALYST_7						
INTEL	2005	DATA_ANALYST_7						
INTEL	2006	DATA_ANALYST_7						
INTEL	2007	DATA_ANALYST_7						
INTEL	2008	DATA_ANALYST_7						
INTEL	2009	DATA_ANALYST_7						
INTEL	2010	DATA_ANALYST_7						
INTEL	2011	DATA_ANALYST_7						
INTEL	2004	DOMESTIC_FIELD_SALES_ENGINEER_84						
INTEL	2005	DOMESTIC_FIELD_SALES_ENGINEER_84						
INTEL	2001	ELECTRONIC_ENGINEER_6						
INTEL	2002	ELECTRONIC_ENGINEER_6						
INTEL	2003	ELECTRONIC_ENGINEER_6						
INTEL	2004	ELECTRONIC_ENGINEER_6						
INTEL	2005	ELECTRONIC_ENGINEER_6						
INTEL	2006	ELECTRONIC_ENGINEER_6						
INTEL	2007	ELECTRONIC_ENGINEER_6						
INTEL	2008	ELECTRONIC_ENGINEER_6						
INTEL	2009	ELECTRONIC_ENGINEER_6						
INTEL	2010	ELECTRONIC_ENGINEER_6						
INTEL	2011	ELECTRONIC_ENGINEER_6						
INTEL	2001	ELECTRONIC_ENGINEER_7						
INTEL	2002	ELECTRONIC_ENGINEER_7						

Percent Change in Total Compensation from Prior Year

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			---(Count)---	---(Count)---		------(Percent)------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2003	ELECTRONIC_ENGINEER_7						
INTEL	2004	ELECTRONIC_ENGINEER_7						
INTEL	2005	ELECTRONIC_ENGINEER_7						
INTEL	2006	ELECTRONIC_ENGINEER_7						
INTEL	2007	ELECTRONIC_ENGINEER_7						
INTEL	2008	ELECTRONIC_ENGINEER_7						
INTEL	2009	ELECTRONIC_ENGINEER_7						
INTEL	2010	ELECTRONIC_ENGINEER_7						
INTEL	2011	ELECTRONIC_ENGINEER_7						
INTEL	2001	ELECTRONIC_ENGINEER_8						
INTEL	2002	ELECTRONIC_ENGINEER_8						
INTEL	2003	ELECTRONIC_ENGINEER_8						
INTEL	2004	ELECTRONIC_ENGINEER_8						
INTEL	2005	ELECTRONIC_ENGINEER_8						
INTEL	2006	ELECTRONIC_ENGINEER_8						
INTEL	2007	ELECTRONIC_ENGINEER_8						
INTEL	2008	ELECTRONIC_ENGINEER_8						
INTEL	2009	ELECTRONIC_ENGINEER_8						
INTEL	2010	ELECTRONIC_ENGINEER_8						
INTEL	2011	ELECTRONIC_ENGINEER_8						
INTEL	2004	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2005	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2006	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2007	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2008	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2009	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2010	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2011	ELECTRO_MECHANICAL_DESIGNER_58						
INTEL	2001	ENGINEERING_MANAGER_10						
INTEL	2002	ENGINEERING_MANAGER_10						
INTEL	2003	ENGINEERING_MANAGER_10						
INTEL	2004	ENGINEERING_MANAGER_10						
INTEL	2005	ENGINEERING_MANAGER_10						
INTEL	2006	ENGINEERING_MANAGER_10						
INTEL	2007	ENGINEERING_MANAGER_10						
INTEL	2008	ENGINEERING_MANAGER_10						
INTEL	2009	ENGINEERING_MANAGER_10						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------------------------(Percent)------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	ENGINEERING_MANAGER_10						
INTEL	2011	ENGINEERING_MANAGER_10						
INTEL	2001	ENGINEERING_MANAGER_11						
INTEL	2002	ENGINEERING_MANAGER_11						
INTEL	2003	ENGINEERING_MANAGER_11						
INTEL	2004	ENGINEERING_MANAGER_11						
INTEL	2005	ENGINEERING_MANAGER_11						
INTEL	2006	ENGINEERING_MANAGER_11						
INTEL	2007	ENGINEERING_MANAGER_11						
INTEL	2008	ENGINEERING_MANAGER_11						
INTEL	2009	ENGINEERING_MANAGER_11						
INTEL	2010	ENGINEERING_MANAGER_11						
INTEL	2011	ENGINEERING_MANAGER_11						
INTEL	2001	ENGINEERING_MANAGER_12						
INTEL	2002	ENGINEERING_MANAGER_12						
INTEL	2003	ENGINEERING_MANAGER_12						
INTEL	2004	ENGINEERING_MANAGER_12						
INTEL	2005	ENGINEERING_MANAGER_12						
INTEL	2006	ENGINEERING_MANAGER_12						
INTEL	2007	ENGINEERING_MANAGER_12						
INTEL	2008	ENGINEERING_MANAGER_12						
INTEL	2009	ENGINEERING_MANAGER_12						
INTEL	2010	ENGINEERING_MANAGER_12						
INTEL	2011	ENGINEERING_MANAGER_12						
INTEL	2004	ENGINEERING_MANAGER_6						
INTEL	2005	ENGINEERING_MANAGER_6						
INTEL	2006	ENGINEERING_MANAGER_6						
INTEL	2007	ENGINEERING_MANAGER_6						
INTEL	2008	ENGINEERING_MANAGER_6						
INTEL	2009	ENGINEERING_MANAGER_6						
INTEL	2010	ENGINEERING_MANAGER_6						
INTEL	2011	ENGINEERING_MANAGER_6						
INTEL	2001	ENGINEERING_MANAGER_7						
INTEL	2002	ENGINEERING_MANAGER_7						
INTEL	2003	ENGINEERING_MANAGER_7						
INTEL	2004	ENGINEERING_MANAGER_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----					
						Percent Change in Total Compensation from Prior Year		
						--(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2005	ENGINEERING_MANAGER_7						
INTEL	2006	ENGINEERING_MANAGER_7						
INTEL	2007	ENGINEERING_MANAGER_7						
INTEL	2008	ENGINEERING_MANAGER_7						
INTEL	2009	ENGINEERING_MANAGER_7						
INTEL	2010	ENGINEERING_MANAGER_7						
INTEL	2011	ENGINEERING_MANAGER_7						
INTEL	2001	ENGINEERING_MANAGER_8						
INTEL	2002	ENGINEERING_MANAGER_8						
INTEL	2003	ENGINEERING_MANAGER_8						
INTEL	2004	ENGINEERING_MANAGER_8						
INTEL	2005	ENGINEERING_MANAGER_8						
INTEL	2006	ENGINEERING_MANAGER_8						
INTEL	2007	ENGINEERING_MANAGER_8						
INTEL	2008	ENGINEERING_MANAGER_8						
INTEL	2009	ENGINEERING_MANAGER_8						
INTEL	2010	ENGINEERING_MANAGER_8						
INTEL	2011	ENGINEERING_MANAGER_8						
INTEL	2001	ENGINEERING_MANAGER_9						
INTEL	2002	ENGINEERING_MANAGER_9						
INTEL	2003	ENGINEERING_MANAGER_9						
INTEL	2004	ENGINEERING_MANAGER_9						
INTEL	2005	ENGINEERING_MANAGER_9						
INTEL	2006	ENGINEERING_MANAGER_9						
INTEL	2007	ENGINEERING_MANAGER_9						
INTEL	2008	ENGINEERING_MANAGER_9						
INTEL	2009	ENGINEERING_MANAGER_9						
INTEL	2010	ENGINEERING_MANAGER_9						
INTEL	2011	ENGINEERING_MANAGER_9						
INTEL	2001	ENGINEERING_SUPERVISOR_6						
INTEL	2002	ENGINEERING_SUPERVISOR_6						
INTEL	2003	ENGINEERING_SUPERVISOR_6						
INTEL	2004	ENGINEERING_TD_MANAGER_10						
INTEL	2005	ENGINEERING_TD_MANAGER_10						
INTEL	2006	ENGINEERING_TD_MANAGER_10						
INTEL	2007	ENGINEERING_TD_MANAGER_10						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			------(Count)------		----------------(Percent)----------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2008	ENGINEERING_TD_MANAGER_10						
INTEL	2009	ENGINEERING_TD_MANAGER_10						
INTEL	2010	ENGINEERING_TD_MANAGER_10						
INTEL	2011	ENGINEERING_TD_MANAGER_10						
INTEL	2004	ENGINEERING_TD_MANAGER_11						
INTEL	2005	ENGINEERING_TD_MANAGER_11						
INTEL	2006	ENGINEERING_TD_MANAGER_11						
INTEL	2007	ENGINEERING_TD_MANAGER_11						
INTEL	2008	ENGINEERING_TD_MANAGER_11						
INTEL	2009	ENGINEERING_TD_MANAGER_11						
INTEL	2010	ENGINEERING_TD_MANAGER_11						
INTEL	2011	ENGINEERING_TD_MANAGER_11						
INTEL	2004	ENGINEERING_TD_MANAGER_7						
INTEL	2005	ENGINEERING_TD_MANAGER_7						
INTEL	2006	ENGINEERING_TD_MANAGER_7						
INTEL	2007	ENGINEERING_TD_MANAGER_7						
INTEL	2008	ENGINEERING_TD_MANAGER_7						
INTEL	2009	ENGINEERING_TD_MANAGER_7						
INTEL	2010	ENGINEERING_TD_MANAGER_7						
INTEL	2011	ENGINEERING_TD_MANAGER_7						
INTEL	2004	ENGINEERING_TD_MANAGER_8						
INTEL	2005	ENGINEERING_TD_MANAGER_8						
INTEL	2006	ENGINEERING_TD_MANAGER_8						
INTEL	2007	ENGINEERING_TD_MANAGER_8						
INTEL	2008	ENGINEERING_TD_MANAGER_8						
INTEL	2009	ENGINEERING_TD_MANAGER_8						
INTEL	2010	ENGINEERING_TD_MANAGER_8						
INTEL	2011	ENGINEERING_TD_MANAGER_8						
INTEL	2004	ENGINEERING_TD_MANAGER_9						
INTEL	2005	ENGINEERING_TD_MANAGER_9						
INTEL	2006	ENGINEERING_TD_MANAGER_9						
INTEL	2007	ENGINEERING_TD_MANAGER_9						
INTEL	2008	ENGINEERING_TD_MANAGER_9						
INTEL	2009	ENGINEERING_TD_MANAGER_9						
INTEL	2010	ENGINEERING_TD_MANAGER_9						
INTEL	2011	ENGINEERING_TD_MANAGER_9						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year				
					Minimum	25th Percentile	75th Percentile	Maximum	
			--------(Count)--------		----------------------------(Percent)----------------------------				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	ENGINEER_TECH_53						
INTEL	2002	ENGINEER_TECH_53						
INTEL	2003	ENGINEER_TECH_53						
INTEL	2001	ENGINEER_TECH_54						
INTEL	2002	ENGINEER_TECH_54						
INTEL	2003	ENGINEER_TECH_54						
INTEL	2001	ENGINEER_TECH_55						
INTEL	2002	ENGINEER_TECH_55						
INTEL	2003	ENGINEER_TECH_55						
INTEL	2001	ENGINEER_TECH_56						
INTEL	2002	ENGINEER_TECH_56						
INTEL	2003	ENGINEER_TECH_56						
INTEL	2001	ENGINEER_TECH_SPEC_57						
INTEL	2002	ENGINEER_TECH_SPEC_57						
INTEL	2003	ENGINEER_TECH_SPEC_57						
INTEL	2001	ENTERPRISE_APPS_ANALYST_3						
INTEL	2002	ENTERPRISE_APPS_ANALYST_3						
INTEL	2003	ENTERPRISE_APPS_ANALYST_3						
INTEL	2001	ENTERPRISE_APPS_ANALYST_5						
INTEL	2002	ENTERPRISE_APPS_ANALYST_5						
INTEL	2003	ENTERPRISE_APPS_ANALYST_5						
INTEL	2004	ENTERPRISE_APPS_ANALYST_5						
INTEL	2007	ENTERPRISE_APPS_ANALYST_5						
INTEL	2008	ENTERPRISE_APPS_ANALYST_5						
INTEL	2001	ENTERPRISE_APPS_ANALYST_6						
INTEL	2002	ENTERPRISE_APPS_ANALYST_6						
INTEL	2003	ENTERPRISE_APPS_ANALYST_6						
INTEL	2004	ENTERPRISE_APPS_ANALYST_6						
INTEL	2010	ENTERPRISE_APPS_ANALYST_6						
INTEL	2011	ENTERPRISE_APPS_ANALYST_6						
INTEL	2001	ENTERPRISE_APPS_ANALYST_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			--------(Count)--------			--------(Percent)--------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	ENTERPRISE_APPS_ANALYST_7						
INTEL	2003	ENTERPRISE_APPS_ANALYST_7						
INTEL	2005	ENTERPRISE_APPS_ANALYST_7						
INTEL	2006	ENTERPRISE_APPS_ANALYST_7						
INTEL	2007	ENTERPRISE_APPS_ANALYST_7						
INTEL	2008	ENTERPRISE_APPS_ANALYST_7						
INTEL	2009	ENTERPRISE_APPS_ANALYST_7						
INTEL	2010	ENTERPRISE_APPS_ANALYST_7						
INTEL	2011	ENTERPRISE_APPS_ANALYST_7						
INTEL	2001	ENTERPRISE_APPS_ANALYST_8						
INTEL	2002	ENTERPRISE_APPS_ANALYST_8						
INTEL	2003	ENTERPRISE_APPS_ANALYST_8						
INTEL	2004	ENTERPRISE_APPS_ANALYST_8						
INTEL	2005	ENTERPRISE_APPS_ANALYST_8						
INTEL	2006	ENTERPRISE_APPS_ANALYST_8						
INTEL	2007	ENTERPRISE_APPS_ANALYST_8						
INTEL	2008	ENTERPRISE_APPS_ANALYST_8						
INTEL	2009	ENTERPRISE_APPS_ANALYST_8						
INTEL	2010	ENTERPRISE_APPS_ANALYST_8						
INTEL	2011	ENTERPRISE_APPS_ANALYST_8						
INTEL	2001	ENTERPRISE_APPS_PROGRAMMER_3						
INTEL	2002	ENTERPRISE_APPS_PROGRAMMER_3						
INTEL	2001	ENTERPRISE_APPS_PROGRAMMER_5						
INTEL	2002	ENTERPRISE_APPS_PROGRAMMER_5						
INTEL	2001	ENTERPRISE_APPS_PROGRAMMER_6						
INTEL	2002	ENTERPRISE_APPS_PROGRAMMER_6						
INTEL	2003	ENTERPRISE_APPS_PROGRAMMER_6						
INTEL	2004	ENTERPRISE_APPS_PROGRAMMER_6						
INTEL	2005	ENTERPRISE_APPS_PROGRAMMER_6						
INTEL	2001	ENTERPRISE_APPS_PROGRAMMER_7						
INTEL	2002	ENTERPRISE_APPS_PROGRAMMER_7						
INTEL	2003	ENTERPRISE_APPS_PROGRAMMER_7						
INTEL	2004	ENTERPRISE_APPS_PROGRAMMER_7						
INTEL	2004	ENTERPRISE_ARCHITECT_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			---(Count)---			---(Percent)---		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2005	ENTERPRISE_ARCHITECT_7						
INTEL	2006	ENTERPRISE_ARCHITECT_7						
INTEL	2007	ENTERPRISE_ARCHITECT_7						
INTEL	2008	ENTERPRISE_ARCHITECT_7						
INTEL	2009	ENTERPRISE_ARCHITECT_7						
INTEL	2010	ENTERPRISE_ARCHITECT_7						
INTEL	2011	ENTERPRISE_ARCHITECT_7						
INTEL	2004	ENTERPRISE_ARCHITECT_8						
INTEL	2005	ENTERPRISE_ARCHITECT_8						
INTEL	2006	ENTERPRISE_ARCHITECT_8						
INTEL	2007	ENTERPRISE_ARCHITECT_8						
INTEL	2008	ENTERPRISE_ARCHITECT_8						
INTEL	2009	ENTERPRISE_ARCHITECT_8						
INTEL	2010	ENTERPRISE_ARCHITECT_8						
INTEL	2011	ENTERPRISE_ARCHITECT_8						
INTEL	2004	ENTERPRISE_ARCHITECT_9						
INTEL	2005	ENTERPRISE_ARCHITECT_9						
INTEL	2006	ENTERPRISE_ARCHITECT_9						
INTEL	2007	ENTERPRISE_ARCHITECT_9						
INTEL	2008	ENTERPRISE_ARCHITECT_9						
INTEL	2009	ENTERPRISE_ARCHITECT_9						
INTEL	2010	ENTERPRISE_ARCHITECT_9						
INTEL	2011	ENTERPRISE_ARCHITECT_9						
INTEL	2001	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2002	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2003	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2004	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2005	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2006	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2007	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2008	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2009	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2010	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2011	FAILURE_ANALYSIS_ENGINEER_5						
INTEL	2001	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2002	FAILURE_ANALYSIS_ENGINEER_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
						(Percent)		
			(Count)					
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2003	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2004	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2005	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2006	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2007	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2008	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2009	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2010	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2011	FAILURE_ANALYSIS_ENGINEER_7						
INTEL	2001	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2002	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2003	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2004	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2005	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2006	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2007	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2008	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2009	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2010	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2011	FIELD_APPLICATIONS_ENGINEER_83						
INTEL	2001	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2002	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2003	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2004	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2005	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2006	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2007	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2008	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2009	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2010	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2011	FIELD_APPLICATIONS_ENGINEER_84						
INTEL	2004	FIELD_SALES_ENGINEER_82						
INTEL	2005	FIELD_SALES_ENGINEER_82						
INTEL	2006	FIELD_SALES_ENGINEER_82						
INTEL	2007	FIELD_SALES_ENGINEER_82						
INTEL	2008	FIELD_SALES_ENGINEER_82						
INTEL	2009	FIELD_SALES_ENGINEER_82						

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----		----(Percent)----			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	FIELD_SALES_ENGINEER_82						
INTEL	2011	FIELD_SALES_ENGINEER_82						
INTEL	2004	FIELD_SALES_ENGINEER_83						
INTEL	2005	FIELD_SALES_ENGINEER_83						
INTEL	2006	FIELD_SALES_ENGINEER_83						
INTEL	2007	FIELD_SALES_ENGINEER_83						
INTEL	2008	FIELD_SALES_ENGINEER_83						
INTEL	2009	FIELD_SALES_ENGINEER_83						
INTEL	2010	FIELD_SALES_ENGINEER_83						
INTEL	2011	FIELD_SALES_ENGINEER_83						
INTEL	2004	FIELD_SALES_ENGINEER_84						
INTEL	2005	FIELD_SALES_ENGINEER_84						
INTEL	2006	FIELD_SALES_ENGINEER_84						
INTEL	2007	FIELD_SALES_ENGINEER_84						
INTEL	2008	FIELD_SALES_ENGINEER_84						
INTEL	2009	FIELD_SALES_ENGINEER_84						
INTEL	2010	FIELD_SALES_ENGINEER_84						
INTEL	2011	FIELD_SALES_ENGINEER_84						
INTEL	2007	GRAPHICS_HARDWARE_ENGINEER_5						
INTEL	2008	GRAPHICS_HARDWARE_ENGINEER_5						
INTEL	2009	GRAPHICS_HARDWARE_ENGINEER_5						
INTEL	2010	GRAPHICS_HARDWARE_ENGINEER_5						
INTEL	2011	GRAPHICS_HARDWARE_ENGINEER_5						
INTEL	2007	GRAPHICS_HARDWARE_ENGINEER_6						
INTEL	2008	GRAPHICS_HARDWARE_ENGINEER_6						
INTEL	2009	GRAPHICS_HARDWARE_ENGINEER_6						
INTEL	2010	GRAPHICS_HARDWARE_ENGINEER_6						
INTEL	2011	GRAPHICS_HARDWARE_ENGINEER_6						
INTEL	2007	GRAPHICS_HARDWARE_ENGINEER_7						
INTEL	2008	GRAPHICS_HARDWARE_ENGINEER_7						
INTEL	2009	GRAPHICS_HARDWARE_ENGINEER_7						
INTEL	2010	GRAPHICS_HARDWARE_ENGINEER_7						
INTEL	2011	GRAPHICS_HARDWARE_ENGINEER_7						
INTEL	2007	GRAPHICS_HARDWARE_ENGINEER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			------(Count)------		------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2008	GRAPHICS_HARDWARE_ENGINEER_8						
INTEL	2009	GRAPHICS_HARDWARE_ENGINEER_8						
INTEL	2010	GRAPHICS_HARDWARE_ENGINEER_8						
INTEL	2011	GRAPHICS_HARDWARE_ENGINEER_8						
INTEL	2007	GRAPHICS_HARDWARE_ENGINEER_9						
INTEL	2008	GRAPHICS_HARDWARE_ENGINEER_9						
INTEL	2009	GRAPHICS_HARDWARE_ENGINEER_9						
INTEL	2010	GRAPHICS_HARDWARE_ENGINEER_9						
INTEL	2011	GRAPHICS_HARDWARE_ENGINEER_9						
INTEL	2007	GRAPHICS_SOFTWARE_ENGINEER_3						
INTEL	2008	GRAPHICS_SOFTWARE_ENGINEER_3						
INTEL	2009	GRAPHICS_SOFTWARE_ENGINEER_3						
INTEL	2010	GRAPHICS_SOFTWARE_ENGINEER_3						
INTEL	2011	GRAPHICS_SOFTWARE_ENGINEER_3						
INTEL	2007	GRAPHICS_SOFTWARE_ENGINEER_5						
INTEL	2008	GRAPHICS_SOFTWARE_ENGINEER_5						
INTEL	2009	GRAPHICS_SOFTWARE_ENGINEER_5						
INTEL	2010	GRAPHICS_SOFTWARE_ENGINEER_5						
INTEL	2011	GRAPHICS_SOFTWARE_ENGINEER_5						
INTEL	2007	GRAPHICS_SOFTWARE_ENGINEER_6						
INTEL	2008	GRAPHICS_SOFTWARE_ENGINEER_6						
INTEL	2009	GRAPHICS_SOFTWARE_ENGINEER_6						
INTEL	2010	GRAPHICS_SOFTWARE_ENGINEER_6						
INTEL	2011	GRAPHICS_SOFTWARE_ENGINEER_6						
INTEL	2007	GRAPHICS_SOFTWARE_ENGINEER_7						
INTEL	2008	GRAPHICS_SOFTWARE_ENGINEER_7						
INTEL	2009	GRAPHICS_SOFTWARE_ENGINEER_7						
INTEL	2010	GRAPHICS_SOFTWARE_ENGINEER_7						
INTEL	2011	GRAPHICS_SOFTWARE_ENGINEER_7						
INTEL	2007	GRAPHICS_SOFTWARE_ENGINEER_8						
INTEL	2008	GRAPHICS_SOFTWARE_ENGINEER_8						
INTEL	2009	GRAPHICS_SOFTWARE_ENGINEER_8						
INTEL	2010	GRAPHICS_SOFTWARE_ENGINEER_8						
INTEL	2011	GRAPHICS_SOFTWARE_ENGINEER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees ---(Count)---	Change from Previous Year ---(Count)---	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
					----------------(Percent)---------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2007	GRAPHICS_SOFTWARE_ENGINEER_9						
INTEL	2008	GRAPHICS_SOFTWARE_ENGINEER_9						
INTEL	2009	GRAPHICS_SOFTWARE_ENGINEER_9						
INTEL	2010	GRAPHICS_SOFTWARE_ENGINEER_9						
INTEL	2011	GRAPHICS_SOFTWARE_ENGINEER_9						
INTEL	2001	HARDWARE_ENGINEER_3						
INTEL	2002	HARDWARE_ENGINEER_3						
INTEL	2003	HARDWARE_ENGINEER_3						
INTEL	2004	HARDWARE_ENGINEER_3						
INTEL	2005	HARDWARE_ENGINEER_3						
INTEL	2006	HARDWARE_ENGINEER_3						
INTEL	2007	HARDWARE_ENGINEER_3						
INTEL	2008	HARDWARE_ENGINEER_3						
INTEL	2009	HARDWARE_ENGINEER_3						
INTEL	2010	HARDWARE_ENGINEER_3						
INTEL	2011	HARDWARE_ENGINEER_3						
INTEL	2001	HARDWARE_ENGINEER_5						
INTEL	2002	HARDWARE_ENGINEER_5						
INTEL	2003	HARDWARE_ENGINEER_5						
INTEL	2004	HARDWARE_ENGINEER_5						
INTEL	2005	HARDWARE_ENGINEER_5						
INTEL	2006	HARDWARE_ENGINEER_5						
INTEL	2007	HARDWARE_ENGINEER_5						
INTEL	2008	HARDWARE_ENGINEER_5						
INTEL	2009	HARDWARE_ENGINEER_5						
INTEL	2010	HARDWARE_ENGINEER_5						
INTEL	2011	HARDWARE_ENGINEER_5						
INTEL	2001	HARDWARE_ENGINEER_6						
INTEL	2002	HARDWARE_ENGINEER_6						
INTEL	2003	HARDWARE_ENGINEER_6						
INTEL	2004	HARDWARE_ENGINEER_6						
INTEL	2005	HARDWARE_ENGINEER_6						
INTEL	2006	HARDWARE_ENGINEER_6						
INTEL	2007	HARDWARE_ENGINEER_6						
INTEL	2008	HARDWARE_ENGINEER_6						
INTEL	2009	HARDWARE_ENGINEER_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
			------(Count)------		------------------------(Percent)------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	HARDWARE_ENGINEER_6						
INTEL	2011	HARDWARE_ENGINEER_6						
INTEL	2001	HARDWARE_ENGINEER_7						
INTEL	2002	HARDWARE_ENGINEER_7						
INTEL	2003	HARDWARE_ENGINEER_7						
INTEL	2004	HARDWARE_ENGINEER_7						
INTEL	2005	HARDWARE_ENGINEER_7						
INTEL	2006	HARDWARE_ENGINEER_7						
INTEL	2007	HARDWARE_ENGINEER_7						
INTEL	2008	HARDWARE_ENGINEER_7						
INTEL	2009	HARDWARE_ENGINEER_7						
INTEL	2010	HARDWARE_ENGINEER_7						
INTEL	2011	HARDWARE_ENGINEER_7						
INTEL	2001	HARDWARE_ENGINEER_8						
INTEL	2002	HARDWARE_ENGINEER_8						
INTEL	2003	HARDWARE_ENGINEER_8						
INTEL	2004	HARDWARE_ENGINEER_8						
INTEL	2005	HARDWARE_ENGINEER_8						
INTEL	2006	HARDWARE_ENGINEER_8						
INTEL	2007	HARDWARE_ENGINEER_8						
INTEL	2008	HARDWARE_ENGINEER_8						
INTEL	2009	HARDWARE_ENGINEER_8						
INTEL	2010	HARDWARE_ENGINEER_8						
INTEL	2011	HARDWARE_ENGINEER_8						
INTEL	2001	HARDWARE_ENGINEER_9						
INTEL	2002	HARDWARE_ENGINEER_9						
INTEL	2003	HARDWARE_ENGINEER_9						
INTEL	2004	HARDWARE_ENGINEER_9						
INTEL	2005	HARDWARE_ENGINEER_9						
INTEL	2006	HARDWARE_ENGINEER_9						
INTEL	2007	HARDWARE_ENGINEER_9						
INTEL	2008	HARDWARE_ENGINEER_9						
INTEL	2009	HARDWARE_ENGINEER_9						
INTEL	2010	HARDWARE_ENGINEER_9						
INTEL	2011	HARDWARE_ENGINEER_9						
INTEL	2001	INDUSTRIAL_ENGINEER_3						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year				
					Minimum	25th Percentile	75th Percentile	Maximum	
			--------(Count)--------		------------------------------(Percent)------------------------------				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	
INTEL	2002	INDUSTRIAL_ENGINEER_3							
INTEL	2003	INDUSTRIAL_ENGINEER_3							
INTEL	2004	INDUSTRIAL_ENGINEER_3							
INTEL	2005	INDUSTRIAL_ENGINEER_3							
INTEL	2006	INDUSTRIAL_ENGINEER_3							
INTEL	2007	INDUSTRIAL_ENGINEER_3							
INTEL	2008	INDUSTRIAL_ENGINEER_3							
INTEL	2009	INDUSTRIAL_ENGINEER_3							
INTEL	2010	INDUSTRIAL_ENGINEER_3							
INTEL	2011	INDUSTRIAL_ENGINEER_3							
INTEL	2001	INDUSTRIAL_ENGINEER_5							
INTEL	2002	INDUSTRIAL_ENGINEER_5							
INTEL	2003	INDUSTRIAL_ENGINEER_5							
INTEL	2004	INDUSTRIAL_ENGINEER_5							
INTEL	2005	INDUSTRIAL_ENGINEER_5							
INTEL	2006	INDUSTRIAL_ENGINEER_5							
INTEL	2007	INDUSTRIAL_ENGINEER_5							
INTEL	2008	INDUSTRIAL_ENGINEER_5							
INTEL	2009	INDUSTRIAL_ENGINEER_5							
INTEL	2010	INDUSTRIAL_ENGINEER_5							
INTEL	2011	INDUSTRIAL_ENGINEER_5							
INTEL	2001	INDUSTRIAL_ENGINEER_6							
INTEL	2002	INDUSTRIAL_ENGINEER_6							
INTEL	2003	INDUSTRIAL_ENGINEER_6							
INTEL	2004	INDUSTRIAL_ENGINEER_6							
INTEL	2005	INDUSTRIAL_ENGINEER_6							
INTEL	2006	INDUSTRIAL_ENGINEER_6							
INTEL	2007	INDUSTRIAL_ENGINEER_6							
INTEL	2008	INDUSTRIAL_ENGINEER_6							
INTEL	2009	INDUSTRIAL_ENGINEER_6							
INTEL	2010	INDUSTRIAL_ENGINEER_6							
INTEL	2011	INDUSTRIAL_ENGINEER_6							
INTEL	2001	INDUSTRIAL_ENGINEER_7							
INTEL	2002	INDUSTRIAL_ENGINEER_7							
INTEL	2003	INDUSTRIAL_ENGINEER_7							
INTEL	2004	INDUSTRIAL_ENGINEER_7							
INTEL	2005	INDUSTRIAL_ENGINEER_7							

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			------(Count)------			----------------(Percent)----------------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2006	INDUSTRIAL_ENGINEER_7						
INTEL	2007	INDUSTRIAL_ENGINEER_7						
INTEL	2008	INDUSTRIAL_ENGINEER_7						
INTEL	2009	INDUSTRIAL_ENGINEER_7						
INTEL	2010	INDUSTRIAL_ENGINEER_7						
INTEL	2011	INDUSTRIAL_ENGINEER_7						
INTEL	2005	INFORMATION_SVCS_PRODUCT_MANAGER_7						
INTEL	2006	INFORMATION_SVCS_PRODUCT_MANAGER_7						
INTEL	2005	INFORMATION_SVCS_PRODUCT_MANAGER_8						
INTEL	2006	INFORMATION_SVCS_PRODUCT_MANAGER_8						
INTEL	2004	INFO_SECURITY_SPECIALIST_6						
INTEL	2005	INFO_SECURITY_SPECIALIST_6						
INTEL	2006	INFO_SECURITY_SPECIALIST_6						
INTEL	2007	INFO_SECURITY_SPECIALIST_6						
INTEL	2008	INFO_SECURITY_SPECIALIST_6						
INTEL	2009	INFO_SECURITY_SPECIALIST_6						
INTEL	2010	INFO_SECURITY_SPECIALIST_6						
INTEL	2011	INFO_SECURITY_SPECIALIST_6						
INTEL	2004	INFO_SECURITY_SPECIALIST_7						
INTEL	2005	INFO_SECURITY_SPECIALIST_7						
INTEL	2006	INFO_SECURITY_SPECIALIST_7						
INTEL	2007	INFO_SECURITY_SPECIALIST_7						
INTEL	2008	INFO_SECURITY_SPECIALIST_7						
INTEL	2009	INFO_SECURITY_SPECIALIST_7						
INTEL	2010	INFO_SECURITY_SPECIALIST_7						
INTEL	2011	INFO_SECURITY_SPECIALIST_7						
INTEL	2004	INFO_SECURITY_SPECIALIST_8						
INTEL	2005	INFO_SECURITY_SPECIALIST_8						
INTEL	2006	INFO_SECURITY_SPECIALIST_8						
INTEL	2007	INFO_SECURITY_SPECIALIST_8						
INTEL	2008	INFO_SECURITY_SPECIALIST_8						
INTEL	2009	INFO_SECURITY_SPECIALIST_8						
INTEL	2010	INFO_SECURITY_SPECIALIST_8						
INTEL	2011	INFO_SECURITY_SPECIALIST_8						

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					\multicolumn{4}{c}{Percent Change in Total Compensation from Prior Year}			
			(Count)	(Count)	(Percent)	(Percent)	(Percent)	(Percent)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	INFO_SERVICES_ANALYST_3						
INTEL	2002	INFO_SERVICES_ANALYST_3						
INTEL	2003	INFO_SERVICES_ANALYST_3						
INTEL	2001	INFO_SERVICES_ANALYST_5						
INTEL	2002	INFO_SERVICES_ANALYST_5						
INTEL	2003	INFO_SERVICES_ANALYST_5						
INTEL	2001	INFO_SERVICES_ANALYST_6						
INTEL	2002	INFO_SERVICES_ANALYST_6						
INTEL	2003	INFO_SERVICES_ANALYST_6						
INTEL	2001	INFO_SERVICES_ANALYST_7						
INTEL	2002	INFO_SERVICES_ANALYST_7						
INTEL	2003	INFO_SERVICES_ANALYST_7						
INTEL	2005	INFO_SERVICES_BUSINESS_ANALYST_3						
INTEL	2006	INFO_SERVICES_BUSINESS_ANALYST_3						
INTEL	2005	INFO_SERVICES_BUSINESS_ANALYST_5						
INTEL	2006	INFO_SERVICES_BUSINESS_ANALYST_5						
INTEL	2005	INFO_SERVICES_BUSINESS_ANALYST_6						
INTEL	2006	INFO_SERVICES_BUSINESS_ANALYST_6						
INTEL	2005	INFO_SERVICES_BUSINESS_ANALYST_7						
INTEL	2006	INFO_SERVICES_BUSINESS_ANALYST_7						
INTEL	2005	INFO_SERVICES_BUSINESS_ANALYST_8						
INTEL	2006	INFO_SERVICES_BUSINESS_ANALYST_8						
INTEL	2001	INFO_TECH_MANAGER_10						
INTEL	2002	INFO_TECH_MANAGER_10						
INTEL	2003	INFO_TECH_MANAGER_10						
INTEL	2004	INFO_TECH_MANAGER_10						
INTEL	2005	INFO_TECH_MANAGER_10						
INTEL	2006	INFO_TECH_MANAGER_10						
INTEL	2007	INFO_TECH_MANAGER_10						
INTEL	2008	INFO_TECH_MANAGER_10						
INTEL	2009	INFO_TECH_MANAGER_10						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----		-------------------(Percent)-------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	INFO_TECH_MANAGER_10						
INTEL	2011	INFO_TECH_MANAGER_10						
INTEL	2001	INFO_TECH_MANAGER_11						
INTEL	2002	INFO_TECH_MANAGER_11						
INTEL	2003	INFO_TECH_MANAGER_11						
INTEL	2004	INFO_TECH_MANAGER_11						
INTEL	2005	INFO_TECH_MANAGER_11						
INTEL	2006	INFO_TECH_MANAGER_11						
INTEL	2007	INFO_TECH_MANAGER_11						
INTEL	2008	INFO_TECH_MANAGER_11						
INTEL	2009	INFO_TECH_MANAGER_11						
INTEL	2010	INFO_TECH_MANAGER_11						
INTEL	2011	INFO_TECH_MANAGER_11						
INTEL	2001	INFO_TECH_MANAGER_7						
INTEL	2002	INFO_TECH_MANAGER_7						
INTEL	2003	INFO_TECH_MANAGER_7						
INTEL	2004	INFO_TECH_MANAGER_7						
INTEL	2005	INFO_TECH_MANAGER_7						
INTEL	2006	INFO_TECH_MANAGER_7						
INTEL	2007	INFO_TECH_MANAGER_7						
INTEL	2008	INFO_TECH_MANAGER_7						
INTEL	2009	INFO_TECH_MANAGER_7						
INTEL	2010	INFO_TECH_MANAGER_7						
INTEL	2011	INFO_TECH_MANAGER_7						
INTEL	2001	INFO_TECH_MANAGER_8						
INTEL	2002	INFO_TECH_MANAGER_8						
INTEL	2003	INFO_TECH_MANAGER_8						
INTEL	2004	INFO_TECH_MANAGER_8						
INTEL	2005	INFO_TECH_MANAGER_8						
INTEL	2006	INFO_TECH_MANAGER_8						
INTEL	2007	INFO_TECH_MANAGER_8						
INTEL	2008	INFO_TECH_MANAGER_8						
INTEL	2009	INFO_TECH_MANAGER_8						
INTEL	2010	INFO_TECH_MANAGER_8						
INTEL	2011	INFO_TECH_MANAGER_8						
INTEL	2001	INFO_TECH_MANAGER_9						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----			----(Percent)----		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	INFO_TECH_MANAGER_9						
INTEL	2003	INFO_TECH_MANAGER_9						
INTEL	2004	INFO_TECH_MANAGER_9						
INTEL	2005	INFO_TECH_MANAGER_9						
INTEL	2006	INFO_TECH_MANAGER_9						
INTEL	2007	INFO_TECH_MANAGER_9						
INTEL	2008	INFO_TECH_MANAGER_9						
INTEL	2009	INFO_TECH_MANAGER_9						
INTEL	2010	INFO_TECH_MANAGER_9						
INTEL	2011	INFO_TECH_MANAGER_9						
INTEL	2001	INTEL_FELLOW_12						
INTEL	2002	INTEL_FELLOW_12						
INTEL	2003	INTEL_FELLOW_12						
INTEL	2004	INTEL_FELLOW_12						
INTEL	2005	INTEL_FELLOW_12						
INTEL	2006	INTEL_FELLOW_12						
INTEL	2007	INTEL_FELLOW_12						
INTEL	2008	INTEL_FELLOW_12						
INTEL	2009	INTEL_FELLOW_12						
INTEL	2010	INTEL_FELLOW_12						
INTEL	2011	INTEL_FELLOW_12						
INTEL	2001	INTERNET_SW_ENG_3						
INTEL	2002	INTERNET_SW_ENG_3						
INTEL	2003	INTERNET_SW_ENG_3						
INTEL	2004	INTERNET_SW_ENG_3						
INTEL	2001	INTERNET_SW_ENG_5						
INTEL	2002	INTERNET_SW_ENG_5						
INTEL	2003	INTERNET_SW_ENG_5						
INTEL	2004	INTERNET_SW_ENG_5						
INTEL	2005	INTERNET_SW_ENG_5						
INTEL	2001	INTERNET_SW_ENG_6						
INTEL	2002	INTERNET_SW_ENG_6						
INTEL	2003	INTERNET_SW_ENG_6						
INTEL	2004	INTERNET_SW_ENG_6						
INTEL	2005	INTERNET_SW_ENG_6						

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					\multicolumn{4}{c}{Percent Change in Total Compensation from Prior Year}
			----(Count)----		\multicolumn{4}{c}{------------------------(Percent)-----------------------}
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	INTERNET_SW_ENG_7						
INTEL	2002	INTERNET_SW_ENG_7						
INTEL	2003	INTERNET_SW_ENG_7						
INTEL	2004	INTERNET_SW_ENG_7						
INTEL	2005	INTERNET_SW_ENG_7						
INTEL	2001	IT_PRODUCT_SUPPORT_SPEC_5						
INTEL	2002	IT_PRODUCT_SUPPORT_SPEC_5						
INTEL	2003	IT_PRODUCT_SUPPORT_SPEC_5						
INTEL	2004	IT_PRODUCT_SUPPORT_SPEC_5						
INTEL	2005	IT_PRODUCT_SUPPORT_SPEC_5						
INTEL	2001	IT_PRODUCT_SUPPORT_SPEC_6						
INTEL	2002	IT_PRODUCT_SUPPORT_SPEC_6						
INTEL	2003	IT_PRODUCT_SUPPORT_SPEC_6						
INTEL	2004	IT_PRODUCT_SUPPORT_SPEC_6						
INTEL	2001	IT_SUPPORT_SPECIALIST_3						
INTEL	2002	IT_SUPPORT_SPECIALIST_3						
INTEL	2003	IT_SUPPORT_SPECIALIST_3						
INTEL	2004	IT_SUPPORT_SPECIALIST_3						
INTEL	2005	IT_SUPPORT_SPECIALIST_3						
INTEL	2006	IT_SUPPORT_SPECIALIST_3						
INTEL	2007	IT_SUPPORT_SPECIALIST_3						
INTEL	2008	IT_SUPPORT_SPECIALIST_3						
INTEL	2009	IT_SUPPORT_SPECIALIST_3						
INTEL	2010	IT_SUPPORT_SPECIALIST_3						
INTEL	2011	IT_SUPPORT_SPECIALIST_3						
INTEL	2001	IT_SUPPORT_SPECIALIST_5						
INTEL	2002	IT_SUPPORT_SPECIALIST_5						
INTEL	2003	IT_SUPPORT_SPECIALIST_5						
INTEL	2004	IT_SUPPORT_SPECIALIST_5						
INTEL	2005	IT_SUPPORT_SPECIALIST_5						
INTEL	2006	IT_SUPPORT_SPECIALIST_5						
INTEL	2007	IT_SUPPORT_SPECIALIST_5						
INTEL	2008	IT_SUPPORT_SPECIALIST_5						
INTEL	2009	IT_SUPPORT_SPECIALIST_5						
INTEL	2010	IT_SUPPORT_SPECIALIST_5						
INTEL	2011	IT_SUPPORT_SPECIALIST_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
				(Count)			(Percent)	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	IT_SUPPORT_SPECIALIST_6						
INTEL	2005	IT_SUPPORT_SPECIALIST_6						
INTEL	2006	IT_SUPPORT_SPECIALIST_6						
INTEL	2007	IT_SUPPORT_SPECIALIST_6						
INTEL	2008	IT_SUPPORT_SPECIALIST_6						
INTEL	2009	IT_SUPPORT_SPECIALIST_6						
INTEL	2010	IT_SUPPORT_SPECIALIST_6						
INTEL	2011	IT_SUPPORT_SPECIALIST_6						
INTEL	2005	IT_SUPPORT_SPECIALIST_7						
INTEL	2006	IT_SUPPORT_SPECIALIST_7						
INTEL	2007	IT_SUPPORT_SPECIALIST_7						
INTEL	2008	IT_SUPPORT_SPECIALIST_7						
INTEL	2009	IT_SUPPORT_SPECIALIST_7						
INTEL	2010	IT_SUPPORT_SPECIALIST_7						
INTEL	2011	IT_SUPPORT_SPECIALIST_7						
INTEL	2001	IT_SYSTEMS_INTEGRATION_3						
INTEL	2002	IT_SYSTEMS_INTEGRATION_3						
INTEL	2003	IT_SYSTEMS_INTEGRATION_3						
INTEL	2004	IT_SYSTEMS_INTEGRATION_3						
INTEL	2005	IT_SYSTEMS_INTEGRATION_3						
INTEL	2001	IT_SYSTEMS_INTEGRATION_5						
INTEL	2002	IT_SYSTEMS_INTEGRATION_5						
INTEL	2003	IT_SYSTEMS_INTEGRATION_5						
INTEL	2004	IT_SYSTEMS_INTEGRATION_5						
INTEL	2005	IT_SYSTEMS_INTEGRATION_5						
INTEL	2001	IT_SYSTEMS_INTEGRATION_6						
INTEL	2002	IT_SYSTEMS_INTEGRATION_6						
INTEL	2003	IT_SYSTEMS_INTEGRATION_6						
INTEL	2004	IT_SYSTEMS_INTEGRATION_6						
INTEL	2005	IT_SYSTEMS_INTEGRATION_6						
INTEL	2001	IT_SYSTEMS_INTEGRATION_7						
INTEL	2002	IT_SYSTEMS_INTEGRATION_7						
INTEL	2003	IT_SYSTEMS_INTEGRATION_7						
INTEL	2004	IT_SYSTEMS_INTEGRATION_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----			----(Percent)----		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2005	IT_SYSTEMS_INTEGRATION_7						
INTEL	2006	IT_SYSTEMS_INTEGRATION_7						
INTEL	2002	IT_SYS_APP_SUPPORT_SPEC_3						
INTEL	2003	IT_SYS_APP_SUPPORT_SPEC_3						
INTEL	2004	IT_SYS_APP_SUPPORT_SPEC_3						
INTEL	2005	IT_SYS_APP_SUPPORT_SPEC_3						
INTEL	2002	IT_SYS_APP_SUPPORT_SPEC_5						
INTEL	2003	IT_SYS_APP_SUPPORT_SPEC_5						
INTEL	2004	IT_SYS_APP_SUPPORT_SPEC_5						
INTEL	2005	IT_SYS_APP_SUPPORT_SPEC_5						
INTEL	2001	MANUFACTURING_ENGINEER_3						
INTEL	2002	MANUFACTURING_ENGINEER_3						
INTEL	2003	MANUFACTURING_ENGINEER_3						
INTEL	2004	MANUFACTURING_ENGINEER_3						
INTEL	2005	MANUFACTURING_ENGINEER_3						
INTEL	2006	MANUFACTURING_ENGINEER_3						
INTEL	2007	MANUFACTURING_ENGINEER_3						
INTEL	2008	MANUFACTURING_ENGINEER_3						
INTEL	2009	MANUFACTURING_ENGINEER_3						
INTEL	2010	MANUFACTURING_ENGINEER_3						
INTEL	2011	MANUFACTURING_ENGINEER_3						
INTEL	2001	MANUFACTURING_ENGINEER_5						
INTEL	2002	MANUFACTURING_ENGINEER_5						
INTEL	2003	MANUFACTURING_ENGINEER_5						
INTEL	2004	MANUFACTURING_ENGINEER_5						
INTEL	2005	MANUFACTURING_ENGINEER_5						
INTEL	2006	MANUFACTURING_ENGINEER_5						
INTEL	2007	MANUFACTURING_ENGINEER_5						
INTEL	2008	MANUFACTURING_ENGINEER_5						
INTEL	2009	MANUFACTURING_ENGINEER_5						
INTEL	2010	MANUFACTURING_ENGINEER_5						
INTEL	2011	MANUFACTURING_ENGINEER_5						
INTEL	2001	MANUFACTURING_ENGINEER_6						
INTEL	2002	MANUFACTURING_ENGINEER_6						
INTEL	2003	MANUFACTURING_ENGINEER_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		----------------(Percent)----------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	MANUFACTURING_ENGINEER_6						
INTEL	2005	MANUFACTURING_ENGINEER_6						
INTEL	2006	MANUFACTURING_ENGINEER_6						
INTEL	2007	MANUFACTURING_ENGINEER_6						
INTEL	2008	MANUFACTURING_ENGINEER_6						
INTEL	2009	MANUFACTURING_ENGINEER_6						
INTEL	2010	MANUFACTURING_ENGINEER_6						
INTEL	2011	MANUFACTURING_ENGINEER_6						
INTEL	2001	MANUFACTURING_ENGINEER_7						
INTEL	2002	MANUFACTURING_ENGINEER_7						
INTEL	2003	MANUFACTURING_ENGINEER_7						
INTEL	2004	MANUFACTURING_ENGINEER_7						
INTEL	2005	MANUFACTURING_ENGINEER_7						
INTEL	2006	MANUFACTURING_ENGINEER_7						
INTEL	2007	MANUFACTURING_ENGINEER_7						
INTEL	2008	MANUFACTURING_ENGINEER_7						
INTEL	2009	MANUFACTURING_ENGINEER_7						
INTEL	2010	MANUFACTURING_ENGINEER_7						
INTEL	2011	MANUFACTURING_ENGINEER_7						
INTEL	2004	MANUFACTURING_MANAGER_7						
INTEL	2005	MANUFACTURING_MANAGER_7						
INTEL	2006	MANUFACTURING_MANAGER_7						
INTEL	2007	MANUFACTURING_MANAGER_7						
INTEL	2008	MANUFACTURING_MANAGER_7						
INTEL	2009	MANUFACTURING_MANAGER_7						
INTEL	2010	MANUFACTURING_MANAGER_7						
INTEL	2011	MANUFACTURING_MANAGER_7						
INTEL	2004	MANUFACTURING_MANAGER_8						
INTEL	2005	MANUFACTURING_MANAGER_8						
INTEL	2006	MANUFACTURING_MANAGER_8						
INTEL	2007	MANUFACTURING_MANAGER_8						
INTEL	2008	MANUFACTURING_MANAGER_8						
INTEL	2009	MANUFACTURING_MANAGER_8						
INTEL	2010	MANUFACTURING_MANAGER_8						
INTEL	2011	MANUFACTURING_MANAGER_8						
INTEL	2004	MANUFACTURING_MANAGER_9						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--------(Count)--------		------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2005	MANUFACTURING_MANAGER_9						
INTEL	2006	MANUFACTURING_MANAGER_9						
INTEL	2007	MANUFACTURING_MANAGER_9						
INTEL	2008	MANUFACTURING_MANAGER_9						
INTEL	2009	MANUFACTURING_MANAGER_9						
INTEL	2010	MANUFACTURING_MANAGER_9						
INTEL	2011	MANUFACTURING_MANAGER_9						
INTEL	2004	MARKETING_ENGINEER_6						
INTEL	2005	MARKETING_ENGINEER_6						
INTEL	2006	MARKETING_ENGINEER_6						
INTEL	2007	MARKETING_ENGINEER_6						
INTEL	2008	MARKETING_ENGINEER_6						
INTEL	2009	MARKETING_ENGINEER_6						
INTEL	2010	MARKETING_ENGINEER_6						
INTEL	2011	MARKETING_ENGINEER_6						
INTEL	2004	MARKETING_ENGINEER_7						
INTEL	2005	MARKETING_ENGINEER_7						
INTEL	2006	MARKETING_ENGINEER_7						
INTEL	2007	MARKETING_ENGINEER_7						
INTEL	2008	MARKETING_ENGINEER_7						
INTEL	2009	MARKETING_ENGINEER_7						
INTEL	2010	MARKETING_ENGINEER_7						
INTEL	2011	MARKETING_ENGINEER_7						
INTEL	2004	MARKETING_ENGINEER_8						
INTEL	2005	MARKETING_ENGINEER_8						
INTEL	2006	MARKETING_ENGINEER_8						
INTEL	2007	MARKETING_ENGINEER_8						
INTEL	2008	MARKETING_ENGINEER_8						
INTEL	2009	MARKETING_ENGINEER_8						
INTEL	2010	MARKETING_ENGINEER_8						
INTEL	2011	MARKETING_ENGINEER_8						
INTEL	2004	MARKETING_ENGINEER_9						
INTEL	2005	MARKETING_ENGINEER_9						
INTEL	2006	MARKETING_ENGINEER_9						
INTEL	2007	MARKETING_ENGINEER_9						
INTEL	2008	MARKETING_ENGINEER_9						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------	------(Count)------	------------------------------(Percent)------------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2009	MARKETING_ENGINEER_9						
INTEL	2010	MARKETING_ENGINEER_9						
INTEL	2011	MARKETING_ENGINEER_9						
INTEL	2001	MASK_DESIGNER_92						
INTEL	2002	MASK_DESIGNER_92						
INTEL	2003	MASK_DESIGNER_92						
INTEL	2004	MASK_DESIGNER_92						
INTEL	2005	MASK_DESIGNER_92						
INTEL	2006	MASK_DESIGNER_92						
INTEL	2007	MASK_DESIGNER_92						
INTEL	2008	MASK_DESIGNER_92						
INTEL	2009	MASK_DESIGNER_92						
INTEL	2010	MASK_DESIGNER_92						
INTEL	2011	MASK_DESIGNER_92						
INTEL	2001	MASK_DESIGNER_93						
INTEL	2002	MASK_DESIGNER_93						
INTEL	2003	MASK_DESIGNER_93						
INTEL	2004	MASK_DESIGNER_93						
INTEL	2005	MASK_DESIGNER_93						
INTEL	2006	MASK_DESIGNER_93						
INTEL	2007	MASK_DESIGNER_93						
INTEL	2008	MASK_DESIGNER_93						
INTEL	2009	MASK_DESIGNER_93						
INTEL	2010	MASK_DESIGNER_93						
INTEL	2011	MASK_DESIGNER_93						
INTEL	2001	MASK_DESIGNER_94						
INTEL	2002	MASK_DESIGNER_94						
INTEL	2003	MASK_DESIGNER_94						
INTEL	2004	MASK_DESIGNER_94						
INTEL	2005	MASK_DESIGNER_94						
INTEL	2006	MASK_DESIGNER_94						
INTEL	2007	MASK_DESIGNER_94						
INTEL	2008	MASK_DESIGNER_94						
INTEL	2009	MASK_DESIGNER_94						
INTEL	2010	MASK_DESIGNER_94						
INTEL	2011	MASK_DESIGNER_94						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
			----(Count)----			----(Percent)----		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	MASK_DESIGNER_95						
INTEL	2002	MASK_DESIGNER_95						
INTEL	2003	MASK_DESIGNER_95						
INTEL	2004	MASK_DESIGNER_95						
INTEL	2005	MASK_DESIGNER_95						
INTEL	2006	MASK_DESIGNER_95						
INTEL	2007	MASK_DESIGNER_95						
INTEL	2008	MASK_DESIGNER_95						
INTEL	2009	MASK_DESIGNER_95						
INTEL	2010	MASK_DESIGNER_95						
INTEL	2011	MASK_DESIGNER_95						
INTEL	2001	MASK_DESIGNER_TRAINEE_91						
INTEL	2002	MASK_DESIGNER_TRAINEE_91						
INTEL	2003	MASK_DESIGNER_TRAINEE_91						
INTEL	2004	MATERIALS_ENGINEER_7						
INTEL	2005	MATERIALS_ENGINEER_7						
INTEL	2006	MATERIALS_ENGINEER_7						
INTEL	2007	MATERIALS_ENGINEER_7						
INTEL	2008	MATERIALS_ENGINEER_7						
INTEL	2009	MATERIALS_ENGINEER_7						
INTEL	2010	MATERIALS_ENGINEER_7						
INTEL	2011	MATERIALS_ENGINEER_7						
INTEL	2005	MATERIALS_TD_ENGINEER_7						
INTEL	2006	MATERIALS_TD_ENGINEER_7						
INTEL	2007	MATERIALS_TD_ENGINEER_7						
INTEL	2008	MATERIALS_TD_ENGINEER_7						
INTEL	2009	MATERIALS_TD_ENGINEER_7						
INTEL	2010	MATERIALS_TD_ENGINEER_7						
INTEL	2011	MATERIALS_TD_ENGINEER_7						
INTEL	2001	MECHANICAL_ENGINEER_3						
INTEL	2002	MECHANICAL_ENGINEER_3						
INTEL	2003	MECHANICAL_ENGINEER_3						
INTEL	2004	MECHANICAL_ENGINEER_3						
INTEL	2005	MECHANICAL_ENGINEER_3						
INTEL	2006	MECHANICAL_ENGINEER_3						
INTEL	2007	MECHANICAL_ENGINEER_3						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			------(Count)------		------	------(Percent)------		------
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2008	MECHANICAL_ENGINEER_3						
INTEL	2009	MECHANICAL_ENGINEER_3						
INTEL	2010	MECHANICAL_ENGINEER_3						
INTEL	2011	MECHANICAL_ENGINEER_3						
INTEL	2001	MECHANICAL_ENGINEER_5						
INTEL	2002	MECHANICAL_ENGINEER_5						
INTEL	2003	MECHANICAL_ENGINEER_5						
INTEL	2004	MECHANICAL_ENGINEER_5						
INTEL	2005	MECHANICAL_ENGINEER_5						
INTEL	2006	MECHANICAL_ENGINEER_5						
INTEL	2007	MECHANICAL_ENGINEER_5						
INTEL	2008	MECHANICAL_ENGINEER_5						
INTEL	2009	MECHANICAL_ENGINEER_5						
INTEL	2010	MECHANICAL_ENGINEER_5						
INTEL	2011	MECHANICAL_ENGINEER_5						
INTEL	2001	MECHANICAL_ENGINEER_6						
INTEL	2002	MECHANICAL_ENGINEER_6						
INTEL	2003	MECHANICAL_ENGINEER_6						
INTEL	2004	MECHANICAL_ENGINEER_6						
INTEL	2005	MECHANICAL_ENGINEER_6						
INTEL	2006	MECHANICAL_ENGINEER_6						
INTEL	2007	MECHANICAL_ENGINEER_6						
INTEL	2008	MECHANICAL_ENGINEER_6						
INTEL	2009	MECHANICAL_ENGINEER_6						
INTEL	2010	MECHANICAL_ENGINEER_6						
INTEL	2011	MECHANICAL_ENGINEER_6						
INTEL	2001	MECHANICAL_ENGINEER_7						
INTEL	2002	MECHANICAL_ENGINEER_7						
INTEL	2003	MECHANICAL_ENGINEER_7						
INTEL	2004	MECHANICAL_ENGINEER_7						
INTEL	2005	MECHANICAL_ENGINEER_7						
INTEL	2006	MECHANICAL_ENGINEER_7						
INTEL	2007	MECHANICAL_ENGINEER_7						
INTEL	2008	MECHANICAL_ENGINEER_7						
INTEL	2009	MECHANICAL_ENGINEER_7						
INTEL	2010	MECHANICAL_ENGINEER_7						
INTEL	2011	MECHANICAL_ENGINEER_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
						(Percent)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			(Count)					
INTEL	2001	MECHANICAL_ENGINEER_8						
INTEL	2002	MECHANICAL_ENGINEER_8						
INTEL	2003	MECHANICAL_ENGINEER_8						
INTEL	2004	MECHANICAL_ENGINEER_8						
INTEL	2005	MECHANICAL_ENGINEER_8						
INTEL	2006	MECHANICAL_ENGINEER_8						
INTEL	2007	MECHANICAL_ENGINEER_8						
INTEL	2008	MECHANICAL_ENGINEER_8						
INTEL	2009	MECHANICAL_ENGINEER_8						
INTEL	2010	MECHANICAL_ENGINEER_8						
INTEL	2011	MECHANICAL_ENGINEER_8						
INTEL	2005	MECHANICAL_TD_ENGINEER_7						
INTEL	2006	MECHANICAL_TD_ENGINEER_7						
INTEL	2007	MECHANICAL_TD_ENGINEER_7						
INTEL	2008	MECHANICAL_TD_ENGINEER_7						
INTEL	2009	MECHANICAL_TD_ENGINEER_7						
INTEL	2010	MECHANICAL_TD_ENGINEER_7						
INTEL	2011	MECHANICAL_TD_ENGINEER_7						
INTEL	2005	MECHANICAL_TD_ENGINEER_8						
INTEL	2006	MECHANICAL_TD_ENGINEER_8						
INTEL	2007	MECHANICAL_TD_ENGINEER_8						
INTEL	2008	MECHANICAL_TD_ENGINEER_8						
INTEL	2009	MECHANICAL_TD_ENGINEER_8						
INTEL	2010	MECHANICAL_TD_ENGINEER_8						
INTEL	2011	MECHANICAL_TD_ENGINEER_8						
INTEL	2004	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2005	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2006	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2007	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2008	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2009	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2010	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2011	MFG_EQUIPMENT_TECH_DIRECT_54						
INTEL	2004	MFG_EQUIPMENT_TECH_DIRECT_55						
INTEL	2005	MFG_EQUIPMENT_TECH_DIRECT_55						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----		------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2006	MFG_EQUIPMENT_TECH_DIRECT_55						
INTEL	2007	MFG_EQUIPMENT_TECH_DIRECT_55						
INTEL	2008	MFG_EQUIPMENT_TECH_DIRECT_55						
INTEL	2009	MFG_EQUIPMENT_TECH_DIRECT_55						
INTEL	2010	MFG_EQUIPMENT_TECH_DIRECT_55						
INTEL	2011	MFG_EQUIPMENT_TECH_DIRECT_55						
INTEL	2004	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2005	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2006	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2007	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2008	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2009	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2010	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2011	MFG_EQUIPMENT_TECH_DIRECT_56						
INTEL	2004	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2005	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2006	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2007	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2008	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2009	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2010	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2011	MFG_EQUIPMENT_TECH_DIRECT_57						
INTEL	2001	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2002	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2003	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2004	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2005	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2006	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2007	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2008	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2009	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2010	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2011	MFG_TECHNICAL_SUPERVISOR_3						
INTEL	2001	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2002	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2003	MFG_TECHNICAL_SUPERVISOR_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----		----(Percent)----			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2005	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2006	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2007	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2008	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2009	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2010	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2011	MFG_TECHNICAL_SUPERVISOR_5						
INTEL	2001	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2002	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2003	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2004	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2005	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2006	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2007	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2008	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2009	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2010	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2011	MFG_TECHNICAL_SUPERVISOR_6						
INTEL	2004	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2005	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2006	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2007	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2008	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2009	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2010	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2011	MFG_TECHNICAL_SUPERVISOR_7						
INTEL	2001	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2002	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2003	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2004	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2005	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2006	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2007	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2008	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2009	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2010	NETWORK_HARDWARE_ENGINEER_6						

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
			------(Count)------		------------------------------(Percent)------------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2011	NETWORK_HARDWARE_ENGINEER_6						
INTEL	2001	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2002	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2003	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2004	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2005	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2006	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2007	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2008	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2009	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2010	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2011	NETWORK_HARDWARE_ENGINEER_7						
INTEL	2001	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2002	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2003	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2004	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2005	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2006	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2007	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2008	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2009	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2010	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2011	NETWORK_SOFTWARE_ENGINEER_3						
INTEL	2001	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2002	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2003	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2004	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2005	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2006	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2007	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2008	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2009	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2010	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2011	NETWORK_SOFTWARE_ENGINEER_5						
INTEL	2001	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2002	NETWORK_SOFTWARE_ENGINEER_6						

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			---(Count)---	---(Count)---				
						---(Percent)---		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2003	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2004	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2005	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2006	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2007	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2008	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2009	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2010	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2011	NETWORK_SOFTWARE_ENGINEER_6						
INTEL	2001	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2002	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2003	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2004	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2005	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2006	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2007	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2008	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2009	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2010	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2011	NETWORK_SOFTWARE_ENGINEER_7						
INTEL	2001	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2002	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2003	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2004	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2005	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2006	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2007	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2008	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2009	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2010	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2011	NETWORK_SOFTWARE_ENGINEER_8						
INTEL	2001	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2002	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2003	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2004	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2005	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2006	NETWORK_SOFTWARE_ENGINEER_9						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			---(Count)---		---(Percent)---			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2007	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2008	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2009	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2010	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2011	NETWORK_SOFTWARE_ENGINEER_9						
INTEL	2001	NETWORK_SPECIALIST_3						
INTEL	2002	NETWORK_SPECIALIST_3						
INTEL	2003	NETWORK_SPECIALIST_3						
INTEL	2004	NETWORK_SPECIALIST_3						
INTEL	2005	NETWORK_SPECIALIST_3						
INTEL	2006	NETWORK_SPECIALIST_3						
INTEL	2007	NETWORK_SPECIALIST_3						
INTEL	2008	NETWORK_SPECIALIST_3						
INTEL	2009	NETWORK_SPECIALIST_3						
INTEL	2010	NETWORK_SPECIALIST_3						
INTEL	2011	NETWORK_SPECIALIST_3						
INTEL	2001	NETWORK_SPECIALIST_5						
INTEL	2002	NETWORK_SPECIALIST_5						
INTEL	2003	NETWORK_SPECIALIST_5						
INTEL	2004	NETWORK_SPECIALIST_5						
INTEL	2005	NETWORK_SPECIALIST_5						
INTEL	2006	NETWORK_SPECIALIST_5						
INTEL	2007	NETWORK_SPECIALIST_5						
INTEL	2008	NETWORK_SPECIALIST_5						
INTEL	2009	NETWORK_SPECIALIST_5						
INTEL	2010	NETWORK_SPECIALIST_5						
INTEL	2011	NETWORK_SPECIALIST_5						
INTEL	2001	NETWORK_SPECIALIST_6						
INTEL	2002	NETWORK_SPECIALIST_6						
INTEL	2003	NETWORK_SPECIALIST_6						
INTEL	2004	NETWORK_SPECIALIST_6						
INTEL	2005	NETWORK_SPECIALIST_6						
INTEL	2006	NETWORK_SPECIALIST_6						
INTEL	2007	NETWORK_SPECIALIST_6						
INTEL	2008	NETWORK_SPECIALIST_6						
INTEL	2009	NETWORK_SPECIALIST_6						
INTEL	2010	NETWORK_SPECIALIST_6						

Exhibit IV.15

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year				
					Minimum	25th Percentile	75th Percentile	Maximum	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	
INTEL	2011	NETWORK_SPECIALIST_6							
INTEL	2001	NETWORK_SPECIALIST_7							
INTEL	2002	NETWORK_SPECIALIST_7							
INTEL	2003	NETWORK_SPECIALIST_7							
INTEL	2004	NETWORK_SPECIALIST_7							
INTEL	2005	NETWORK_SPECIALIST_7							
INTEL	2006	NETWORK_SPECIALIST_7							
INTEL	2007	NETWORK_SPECIALIST_7							
INTEL	2008	NETWORK_SPECIALIST_7							
INTEL	2009	NETWORK_SPECIALIST_7							
INTEL	2010	NETWORK_SPECIALIST_7							
INTEL	2011	NETWORK_SPECIALIST_7							
INTEL	2001	NETWORK_SPECIALIST_8							
INTEL	2002	NETWORK_SPECIALIST_8							
INTEL	2003	NETWORK_SPECIALIST_8							
INTEL	2004	NETWORK_SPECIALIST_8							
INTEL	2005	NETWORK_SPECIALIST_8							
INTEL	2006	NETWORK_SPECIALIST_8							
INTEL	2007	NETWORK_SPECIALIST_8							
INTEL	2008	NETWORK_SPECIALIST_8							
INTEL	2009	NETWORK_SPECIALIST_8							
INTEL	2010	NETWORK_SPECIALIST_8							
INTEL	2011	NETWORK_SPECIALIST_8							
INTEL	2001	PACKAGING_ENGINEER_5							
INTEL	2002	PACKAGING_ENGINEER_5							
INTEL	2003	PACKAGING_ENGINEER_5							
INTEL	2004	PACKAGING_ENGINEER_5							
INTEL	2005	PACKAGING_ENGINEER_5							
INTEL	2006	PACKAGING_ENGINEER_5							
INTEL	2007	PACKAGING_ENGINEER_5							
INTEL	2008	PACKAGING_ENGINEER_5							
INTEL	2009	PACKAGING_ENGINEER_5							
INTEL	2010	PACKAGING_ENGINEER_5							
INTEL	2011	PACKAGING_ENGINEER_5							
INTEL	2001	PACKAGING_ENGINEER_6							
INTEL	2002	PACKAGING_ENGINEER_6							

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		\multicolumn{4}{c}{Percent Change in Total Compensation from Prior Year}
					\multicolumn{4}{c}{----(Percent)----}
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2003	PACKAGING_ENGINEER_6						
INTEL	2004	PACKAGING_ENGINEER_6						
INTEL	2005	PACKAGING_ENGINEER_6						
INTEL	2006	PACKAGING_ENGINEER_6						
INTEL	2007	PACKAGING_ENGINEER_6						
INTEL	2008	PACKAGING_ENGINEER_6						
INTEL	2009	PACKAGING_ENGINEER_6						
INTEL	2010	PACKAGING_ENGINEER_6						
INTEL	2011	PACKAGING_ENGINEER_6						
INTEL	2001	PACKAGING_ENGINEER_7						
INTEL	2002	PACKAGING_ENGINEER_7						
INTEL	2003	PACKAGING_ENGINEER_7						
INTEL	2004	PACKAGING_ENGINEER_7						
INTEL	2005	PACKAGING_ENGINEER_7						
INTEL	2006	PACKAGING_ENGINEER_7						
INTEL	2007	PACKAGING_ENGINEER_7						
INTEL	2008	PACKAGING_ENGINEER_7						
INTEL	2009	PACKAGING_ENGINEER_7						
INTEL	2010	PACKAGING_ENGINEER_7						
INTEL	2011	PACKAGING_ENGINEER_7						
INTEL	2001	PACKAGING_ENGINEER_8						
INTEL	2002	PACKAGING_ENGINEER_8						
INTEL	2003	PACKAGING_ENGINEER_8						
INTEL	2004	PACKAGING_ENGINEER_8						
INTEL	2005	PACKAGING_ENGINEER_8						
INTEL	2006	PACKAGING_ENGINEER_8						
INTEL	2007	PACKAGING_ENGINEER_8						
INTEL	2008	PACKAGING_ENGINEER_8						
INTEL	2009	PACKAGING_ENGINEER_8						
INTEL	2010	PACKAGING_ENGINEER_8						
INTEL	2011	PACKAGING_ENGINEER_8						
INTEL	2001	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2002	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2003	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2004	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2005	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2006	PHYSICAL_DESIGN_ENGINEER_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------------------------(Percent)------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2007	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2008	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2009	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2010	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2011	PHYSICAL_DESIGN_ENGINEER_5						
INTEL	2001	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2002	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2003	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2004	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2005	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2006	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2007	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2008	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2009	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2010	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2011	PHYSICAL_DESIGN_ENGINEER_6						
INTEL	2001	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2002	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2003	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2004	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2005	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2006	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2007	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2008	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2009	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2010	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2011	PHYSICAL_DESIGN_ENGINEER_7						
INTEL	2001	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2002	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2003	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2004	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2005	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2006	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2007	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2008	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2009	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2010	PHYSICAL_DESIGN_ENGINEER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----			---(Percent)---		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2011	PHYSICAL_DESIGN_ENGINEER_8						
INTEL	2005	PLATFORM_ARCHITECT_9						
INTEL	2006	PLATFORM_ARCHITECT_9						
INTEL	2007	PLATFORM_ARCHITECT_9						
INTEL	2008	PLATFORM_ARCHITECT_9						
INTEL	2009	PLATFORM_ARCHITECT_9						
INTEL	2010	PLATFORM_ARCHITECT_9						
INTEL	2011	PLATFORM_ARCHITECT_9						
INTEL	2001	PRINCIPAL_ENGINEER_10						
INTEL	2002	PRINCIPAL_ENGINEER_10						
INTEL	2003	PRINCIPAL_ENGINEER_10						
INTEL	2004	PRINCIPAL_ENGINEER_10						
INTEL	2005	PRINCIPAL_ENGINEER_10						
INTEL	2006	PRINCIPAL_ENGINEER_10						
INTEL	2007	PRINCIPAL_ENGINEER_10						
INTEL	2008	PRINCIPAL_ENGINEER_10						
INTEL	2009	PRINCIPAL_ENGINEER_10						
INTEL	2010	PRINCIPAL_ENGINEER_10						
INTEL	2011	PRINCIPAL_ENGINEER_10						
INTEL	2001	PRINCIPAL_ENGINEER_11						
INTEL	2002	PRINCIPAL_ENGINEER_11						
INTEL	2004	PRINCIPAL_ENGINEER_11						
INTEL	2005	PRINCIPAL_ENGINEER_11						
INTEL	2006	PRINCIPAL_ENGINEER_11						
INTEL	2007	PRINCIPAL_ENGINEER_11						
INTEL	2008	PRINCIPAL_ENGINEER_11						
INTEL	2009	PRINCIPAL_ENGINEER_11						
INTEL	2010	PRINCIPAL_ENGINEER_11						
INTEL	2011	PRINCIPAL_ENGINEER_11						
INTEL	2001	PROCESS_ENGINEER_3						
INTEL	2002	PROCESS_ENGINEER_3						
INTEL	2003	PROCESS_ENGINEER_3						
INTEL	2004	PROCESS_ENGINEER_3						
INTEL	2005	PROCESS_ENGINEER_3						
INTEL	2006	PROCESS_ENGINEER_3						
INTEL	2007	PROCESS_ENGINEER_3						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------Percent Change in Total Compensation from Prior Year------ (Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2008	PROCESS_ENGINEER_3						
INTEL	2009	PROCESS_ENGINEER_3						
INTEL	2010	PROCESS_ENGINEER_3						
INTEL	2011	PROCESS_ENGINEER_3						
INTEL	2001	PROCESS_ENGINEER_5						
INTEL	2002	PROCESS_ENGINEER_5						
INTEL	2003	PROCESS_ENGINEER_5						
INTEL	2004	PROCESS_ENGINEER_5						
INTEL	2005	PROCESS_ENGINEER_5						
INTEL	2006	PROCESS_ENGINEER_5						
INTEL	2007	PROCESS_ENGINEER_5						
INTEL	2008	PROCESS_ENGINEER_5						
INTEL	2009	PROCESS_ENGINEER_5						
INTEL	2010	PROCESS_ENGINEER_5						
INTEL	2011	PROCESS_ENGINEER_5						
INTEL	2001	PROCESS_ENGINEER_6						
INTEL	2002	PROCESS_ENGINEER_6						
INTEL	2003	PROCESS_ENGINEER_6						
INTEL	2004	PROCESS_ENGINEER_6						
INTEL	2005	PROCESS_ENGINEER_6						
INTEL	2006	PROCESS_ENGINEER_6						
INTEL	2007	PROCESS_ENGINEER_6						
INTEL	2008	PROCESS_ENGINEER_6						
INTEL	2009	PROCESS_ENGINEER_6						
INTEL	2010	PROCESS_ENGINEER_6						
INTEL	2011	PROCESS_ENGINEER_6						
INTEL	2001	PROCESS_ENGINEER_7						
INTEL	2002	PROCESS_ENGINEER_7						
INTEL	2003	PROCESS_ENGINEER_7						
INTEL	2004	PROCESS_ENGINEER_7						
INTEL	2005	PROCESS_ENGINEER_7						
INTEL	2006	PROCESS_ENGINEER_7						
INTEL	2007	PROCESS_ENGINEER_7						
INTEL	2008	PROCESS_ENGINEER_7						
INTEL	2009	PROCESS_ENGINEER_7						
INTEL	2010	PROCESS_ENGINEER_7						
INTEL	2011	PROCESS_ENGINEER_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			------(Count)------		----------------------------(Percent)----------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	PROCESS_ENGINEER_8						
INTEL	2002	PROCESS_ENGINEER_8						
INTEL	2003	PROCESS_ENGINEER_8						
INTEL	2004	PROCESS_ENGINEER_8						
INTEL	2005	PROCESS_ENGINEER_8						
INTEL	2006	PROCESS_ENGINEER_8						
INTEL	2007	PROCESS_ENGINEER_8						
INTEL	2008	PROCESS_ENGINEER_8						
INTEL	2009	PROCESS_ENGINEER_8						
INTEL	2010	PROCESS_ENGINEER_8						
INTEL	2011	PROCESS_ENGINEER_8						
INTEL	2001	PROCESS_ENGINEER_9						
INTEL	2002	PROCESS_ENGINEER_9						
INTEL	2003	PROCESS_ENGINEER_9						
INTEL	2004	PROCESS_ENGINEER_9						
INTEL	2005	PROCESS_ENGINEER_9						
INTEL	2006	PROCESS_ENGINEER_9						
INTEL	2007	PROCESS_ENGINEER_9						
INTEL	2008	PROCESS_ENGINEER_9						
INTEL	2009	PROCESS_ENGINEER_9						
INTEL	2010	PROCESS_ENGINEER_9						
INTEL	2011	PROCESS_ENGINEER_9						
INTEL	2005	PROCESS_TD_ENGINEER_3						
INTEL	2006	PROCESS_TD_ENGINEER_3						
INTEL	2007	PROCESS_TD_ENGINEER_3						
INTEL	2008	PROCESS_TD_ENGINEER_3						
INTEL	2009	PROCESS_TD_ENGINEER_3						
INTEL	2010	PROCESS_TD_ENGINEER_3						
INTEL	2011	PROCESS_TD_ENGINEER_3						
INTEL	2005	PROCESS_TD_ENGINEER_5						
INTEL	2006	PROCESS_TD_ENGINEER_5						
INTEL	2007	PROCESS_TD_ENGINEER_5						
INTEL	2008	PROCESS_TD_ENGINEER_5						
INTEL	2009	PROCESS_TD_ENGINEER_5						
INTEL	2010	PROCESS_TD_ENGINEER_5						
INTEL	2011	PROCESS_TD_ENGINEER_5						

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			----(Count)----		----(Percent)----			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	PROCESS_TD_ENGINEER_6						
INTEL	2005	PROCESS_TD_ENGINEER_6						
INTEL	2006	PROCESS_TD_ENGINEER_6						
INTEL	2007	PROCESS_TD_ENGINEER_6						
INTEL	2008	PROCESS_TD_ENGINEER_6						
INTEL	2009	PROCESS_TD_ENGINEER_6						
INTEL	2010	PROCESS_TD_ENGINEER_6						
INTEL	2011	PROCESS_TD_ENGINEER_6						
INTEL	2004	PROCESS_TD_ENGINEER_7						
INTEL	2005	PROCESS_TD_ENGINEER_7						
INTEL	2006	PROCESS_TD_ENGINEER_7						
INTEL	2007	PROCESS_TD_ENGINEER_7						
INTEL	2008	PROCESS_TD_ENGINEER_7						
INTEL	2009	PROCESS_TD_ENGINEER_7						
INTEL	2010	PROCESS_TD_ENGINEER_7						
INTEL	2011	PROCESS_TD_ENGINEER_7						
INTEL	2004	PROCESS_TD_ENGINEER_8						
INTEL	2005	PROCESS_TD_ENGINEER_8						
INTEL	2006	PROCESS_TD_ENGINEER_8						
INTEL	2007	PROCESS_TD_ENGINEER_8						
INTEL	2008	PROCESS_TD_ENGINEER_8						
INTEL	2009	PROCESS_TD_ENGINEER_8						
INTEL	2010	PROCESS_TD_ENGINEER_8						
INTEL	2011	PROCESS_TD_ENGINEER_8						
INTEL	2004	PROCESS_TD_ENGINEER_9						
INTEL	2005	PROCESS_TD_ENGINEER_9						
INTEL	2006	PROCESS_TD_ENGINEER_9						
INTEL	2007	PROCESS_TD_ENGINEER_9						
INTEL	2008	PROCESS_TD_ENGINEER_9						
INTEL	2009	PROCESS_TD_ENGINEER_9						
INTEL	2010	PROCESS_TD_ENGINEER_9						
INTEL	2011	PROCESS_TD_ENGINEER_9						
INTEL	2001	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2002	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2003	PRODUCT_DEVELOPMENT_ENG_3						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------------------------------(Percent)------------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2005	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2006	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2007	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2008	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2009	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2010	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2011	PRODUCT_DEVELOPMENT_ENG_3						
INTEL	2001	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2002	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2003	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2004	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2005	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2006	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2007	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2008	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2009	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2010	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2011	PRODUCT_DEVELOPMENT_ENG_5						
INTEL	2001	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2002	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2003	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2004	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2005	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2006	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2007	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2008	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2009	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2010	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2011	PRODUCT_DEVELOPMENT_ENG_6						
INTEL	2001	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2002	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2003	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2004	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2005	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2006	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2007	PRODUCT_DEVELOPMENT_ENG_7						

Percent Change in Total Compensation from Prior Year

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		----(Percent)----			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2008	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2009	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2010	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2011	PRODUCT_DEVELOPMENT_ENG_7						
INTEL	2001	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2002	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2003	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2004	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2005	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2006	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2007	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2008	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2009	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2010	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2011	PRODUCT_DEVELOPMENT_ENG_8						
INTEL	2001	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2002	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2003	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2004	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2005	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2006	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2007	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2008	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2009	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2010	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2011	PRODUCT_DEVELOPMENT_ENG_9						
INTEL	2001	PRODUCT_ENGINEER_3						
INTEL	2002	PRODUCT_ENGINEER_3						
INTEL	2003	PRODUCT_ENGINEER_3						
INTEL	2004	PRODUCT_ENGINEER_3						
INTEL	2005	PRODUCT_ENGINEER_3						
INTEL	2006	PRODUCT_ENGINEER_3						
INTEL	2007	PRODUCT_ENGINEER_3						
INTEL	2008	PRODUCT_ENGINEER_3						
INTEL	2009	PRODUCT_ENGINEER_3						
INTEL	2010	PRODUCT_ENGINEER_3						
INTEL	2011	PRODUCT_ENGINEER_3						

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					\multicolumn Percent Change in Total Compensation from Prior Year			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			--------(Count)--------		--------(Percent)--------			
INTEL	2001	PRODUCT_ENGINEER_5						
INTEL	2002	PRODUCT_ENGINEER_5						
INTEL	2003	PRODUCT_ENGINEER_5						
INTEL	2004	PRODUCT_ENGINEER_5						
INTEL	2005	PRODUCT_ENGINEER_5						
INTEL	2006	PRODUCT_ENGINEER_5						
INTEL	2007	PRODUCT_ENGINEER_5						
INTEL	2008	PRODUCT_ENGINEER_5						
INTEL	2009	PRODUCT_ENGINEER_5						
INTEL	2010	PRODUCT_ENGINEER_5						
INTEL	2011	PRODUCT_ENGINEER_5						
INTEL	2001	PRODUCT_ENGINEER_6						
INTEL	2002	PRODUCT_ENGINEER_6						
INTEL	2003	PRODUCT_ENGINEER_6						
INTEL	2004	PRODUCT_ENGINEER_6						
INTEL	2005	PRODUCT_ENGINEER_6						
INTEL	2006	PRODUCT_ENGINEER_6						
INTEL	2007	PRODUCT_ENGINEER_6						
INTEL	2008	PRODUCT_ENGINEER_6						
INTEL	2009	PRODUCT_ENGINEER_6						
INTEL	2010	PRODUCT_ENGINEER_6						
INTEL	2011	PRODUCT_ENGINEER_6						
INTEL	2001	PRODUCT_ENGINEER_7						
INTEL	2002	PRODUCT_ENGINEER_7						
INTEL	2003	PRODUCT_ENGINEER_7						
INTEL	2004	PRODUCT_ENGINEER_7						
INTEL	2005	PRODUCT_ENGINEER_7						
INTEL	2006	PRODUCT_ENGINEER_7						
INTEL	2007	PRODUCT_ENGINEER_7						
INTEL	2008	PRODUCT_ENGINEER_7						
INTEL	2009	PRODUCT_ENGINEER_7						
INTEL	2010	PRODUCT_ENGINEER_7						
INTEL	2011	PRODUCT_ENGINEER_7						
INTEL	2001	PRODUCT_ENGINEER_8						
INTEL	2002	PRODUCT_ENGINEER_8						
INTEL	2003	PRODUCT_ENGINEER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
			----(Count)----	----(Count)----			--(Percent)--	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	PRODUCT_ENGINEER_8						
INTEL	2005	PRODUCT_ENGINEER_8						
INTEL	2006	PRODUCT_ENGINEER_8						
INTEL	2007	PRODUCT_ENGINEER_8						
INTEL	2008	PRODUCT_ENGINEER_8						
INTEL	2009	PRODUCT_ENGINEER_8						
INTEL	2010	PRODUCT_ENGINEER_8						
INTEL	2011	PRODUCT_ENGINEER_8						
INTEL	2001	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2002	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2003	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2004	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2005	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2006	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2007	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2008	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2009	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2010	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2011	PRODUCT_MARKETING_ENGR_MANAGER_10						
INTEL	2001	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2002	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2003	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2004	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2005	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2006	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2007	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2008	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2009	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2010	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2011	PRODUCT_MARKETING_ENGR_MANAGER_9						
INTEL	2008	PRODUCT_SERVICE_LINE_MANAGER_7						
INTEL	2009	PRODUCT_SERVICE_LINE_MANAGER_7						
INTEL	2010	PRODUCT_SERVICE_LINE_MANAGER_7						
INTEL	2011	PRODUCT_SERVICE_LINE_MANAGER_7						
INTEL	2008	PRODUCT_SERVICE_LINE_MANAGER_8						
INTEL	2009	PRODUCT_SERVICE_LINE_MANAGER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			(Count)	(Count)	(Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	PRODUCT_SERVICE_LINE_MANAGER_8						
INTEL	2011	PRODUCT_SERVICE_LINE_MANAGER_8						
INTEL	2001	PROD_DEV_MKT_ENGINEER_7						
INTEL	2002	PROD_DEV_MKT_ENGINEER_7						
INTEL	2003	PROD_DEV_MKT_ENGINEER_7						
INTEL	2001	PROD_DEV_MKT_ENGINEER_8						
INTEL	2002	PROD_DEV_MKT_ENGINEER_8						
INTEL	2003	PROD_DEV_MKT_ENGINEER_8						
INTEL	2001	PROD_DEV_MKT_ENGINEER_9						
INTEL	2002	PROD_DEV_MKT_ENGINEER_9						
INTEL	2003	PROD_DEV_MKT_ENGINEER_9						
INTEL	2004	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2005	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2006	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2007	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2008	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2009	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2010	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2011	PROD_LINE_MKTG_ENGINEER_6						
INTEL	2004	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2005	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2006	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2007	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2008	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2009	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2010	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2011	PROD_LINE_MKTG_ENGINEER_7						
INTEL	2004	PROD_LINE_MKTG_ENGINEER_8						
INTEL	2005	PROD_LINE_MKTG_ENGINEER_8						
INTEL	2006	PROD_LINE_MKTG_ENGINEER_8						
INTEL	2007	PROD_LINE_MKTG_ENGINEER_8						
INTEL	2008	PROD_LINE_MKTG_ENGINEER_8						
INTEL	2009	PROD_LINE_MKTG_ENGINEER_8						
INTEL	2010	PROD_LINE_MKTG_ENGINEER_8						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			------(Count)------		------------------(Percent)------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2011	PROD_LINE_MKTG_ENGINEER_8						
INTEL	2004	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2005	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2006	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2007	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2008	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2009	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2010	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2011	PROD_LINE_MKTG_ENGINEER_9						
INTEL	2001	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2002	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2003	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2004	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2005	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2006	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2007	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2008	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2009	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2010	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2011	PROJECT_PROGRAM_MANAGER_TECH_10						
INTEL	2004	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2005	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2006	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2007	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2008	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2009	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2010	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2011	PROJECT_PROGRAM_MANAGER_TECH_5						
INTEL	2004	PROJECT_PROGRAM_MANAGER_TECH_6						
INTEL	2005	PROJECT_PROGRAM_MANAGER_TECH_6						
INTEL	2006	PROJECT_PROGRAM_MANAGER_TECH_6						
INTEL	2007	PROJECT_PROGRAM_MANAGER_TECH_6						
INTEL	2008	PROJECT_PROGRAM_MANAGER_TECH_6						
INTEL	2009	PROJECT_PROGRAM_MANAGER_TECH_6						
INTEL	2010	PROJECT_PROGRAM_MANAGER_TECH_6						
INTEL	2011	PROJECT_PROGRAM_MANAGER_TECH_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year	
			----(Count)----		---------(Percent)---------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2002	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2003	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2004	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2005	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2006	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2007	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2008	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2009	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2010	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2011	PROJECT_PROGRAM_MANAGER_TECH_7						
INTEL	2001	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2002	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2003	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2004	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2005	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2006	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2007	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2008	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2009	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2010	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2011	PROJECT_PROGRAM_MANAGER_TECH_8						
INTEL	2001	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2002	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2003	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2004	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2005	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2006	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2007	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2008	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2009	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2010	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2011	PROJECT_PROGRAM_MANAGER_TECH_9						
INTEL	2001	PROJ_PROG_COORD_3						
INTEL	2002	PROJ_PROG_COORD_3						
INTEL	2003	PROJ_PROG_COORD_3						

Exhibit IV.15

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Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		----------------(Percent)----------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	PROJ_PROG_COORD_5						
INTEL	2002	PROJ_PROG_COORD_5						
INTEL	2003	PROJ_PROG_COORD_5						
INTEL	2001	PROJ_PROG_COORD_6						
INTEL	2002	PROJ_PROG_COORD_6						
INTEL	2003	PROJ_PROG_COORD_6						
INTEL	2008	PTD_MOD_&_INTEGR_YIELD_ENG_7						
INTEL	2009	PTD_MOD_&_INTEGR_YIELD_ENG_7						
INTEL	2010	PTD_MOD_&_INTEGR_YIELD_ENG_7						
INTEL	2011	PTD_MOD_&_INTEGR_YIELD_ENG_7						
INTEL	2008	PTD_MOD_&_INTEGR_YIELD_ENG_8						
INTEL	2009	PTD_MOD_&_INTEGR_YIELD_ENG_8						
INTEL	2010	PTD_MOD_&_INTEGR_YIELD_ENG_8						
INTEL	2011	PTD_MOD_&_INTEGR_YIELD_ENG_8						
INTEL	2008	PTD_MOD_&_INTEGR_YIELD_ENG_9						
INTEL	2009	PTD_MOD_&_INTEGR_YIELD_ENG_9						
INTEL	2010	PTD_MOD_&_INTEGR_YIELD_ENG_9						
INTEL	2011	PTD_MOD_&_INTEGR_YIELD_ENG_9						
INTEL	2001	QUALITY_ENGINEER_3						
INTEL	2002	QUALITY_ENGINEER_3						
INTEL	2003	QUALITY_ENGINEER_3						
INTEL	2004	QUALITY_ENGINEER_3						
INTEL	2005	QUALITY_ENGINEER_3						
INTEL	2006	QUALITY_ENGINEER_3						
INTEL	2007	QUALITY_ENGINEER_3						
INTEL	2008	QUALITY_ENGINEER_3						
INTEL	2009	QUALITY_ENGINEER_3						
INTEL	2010	QUALITY_ENGINEER_3						
INTEL	2011	QUALITY_ENGINEER_3						
INTEL	2001	QUALITY_ENGINEER_5						
INTEL	2002	QUALITY_ENGINEER_5						
INTEL	2003	QUALITY_ENGINEER_5						
INTEL	2004	QUALITY_ENGINEER_5						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		----------------(Percent)----------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2005	QUALITY_ENGINEER_5						
INTEL	2006	QUALITY_ENGINEER_5						
INTEL	2007	QUALITY_ENGINEER_5						
INTEL	2008	QUALITY_ENGINEER_5						
INTEL	2009	QUALITY_ENGINEER_5						
INTEL	2010	QUALITY_ENGINEER_5						
INTEL	2011	QUALITY_ENGINEER_5						
INTEL	2001	QUALITY_ENGINEER_6						
INTEL	2002	QUALITY_ENGINEER_6						
INTEL	2003	QUALITY_ENGINEER_6						
INTEL	2004	QUALITY_ENGINEER_6						
INTEL	2005	QUALITY_ENGINEER_6						
INTEL	2006	QUALITY_ENGINEER_6						
INTEL	2007	QUALITY_ENGINEER_6						
INTEL	2008	QUALITY_ENGINEER_6						
INTEL	2009	QUALITY_ENGINEER_6						
INTEL	2010	QUALITY_ENGINEER_6						
INTEL	2011	QUALITY_ENGINEER_6						
INTEL	2001	QUALITY_ENGINEER_7						
INTEL	2002	QUALITY_ENGINEER_7						
INTEL	2003	QUALITY_ENGINEER_7						
INTEL	2004	QUALITY_ENGINEER_7						
INTEL	2005	QUALITY_ENGINEER_7						
INTEL	2006	QUALITY_ENGINEER_7						
INTEL	2007	QUALITY_ENGINEER_7						
INTEL	2008	QUALITY_ENGINEER_7						
INTEL	2009	QUALITY_ENGINEER_7						
INTEL	2010	QUALITY_ENGINEER_7						
INTEL	2011	QUALITY_ENGINEER_7						
INTEL	2001	QUALITY_ENGINEER_8						
INTEL	2002	QUALITY_ENGINEER_8						
INTEL	2003	QUALITY_ENGINEER_8						
INTEL	2004	QUALITY_ENGINEER_8						
INTEL	2005	QUALITY_ENGINEER_8						
INTEL	2006	QUALITY_ENGINEER_8						
INTEL	2007	QUALITY_ENGINEER_8						
INTEL	2008	QUALITY_ENGINEER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees --(Count)--	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year --(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2009	QUALITY_ENGINEER_8						
INTEL	2010	QUALITY_ENGINEER_8						
INTEL	2011	QUALITY_ENGINEER_8						
INTEL	2001	QUALITY_ENGINEER_9						
INTEL	2002	QUALITY_ENGINEER_9						
INTEL	2003	QUALITY_ENGINEER_9						
INTEL	2004	QUALITY_ENGINEER_9						
INTEL	2005	QUALITY_ENGINEER_9						
INTEL	2006	QUALITY_ENGINEER_9						
INTEL	2007	QUALITY_ENGINEER_9						
INTEL	2008	QUALITY_ENGINEER_9						
INTEL	2009	QUALITY_ENGINEER_9						
INTEL	2010	QUALITY_ENGINEER_9						
INTEL	2011	QUALITY_ENGINEER_9						
INTEL	2002	Q_&_R_ENGINEER_6						
INTEL	2003	Q_&_R_ENGINEER_6						
INTEL	2004	Q_&_R_ENGINEER_6						
INTEL	2005	Q_&_R_ENGINEER_6						
INTEL	2001	Q_&_R_ENGINEER_7						
INTEL	2002	Q_&_R_ENGINEER_7						
INTEL	2003	Q_&_R_ENGINEER_7						
INTEL	2004	Q_&_R_ENGINEER_7						
INTEL	2005	Q_&_R_ENGINEER_7						
INTEL	2004	Q_&_R_ENGINEER_8						
INTEL	2005	Q_&_R_ENGINEER_8						
INTEL	2006	RELIABILITY_ENGINEER_5						
INTEL	2007	RELIABILITY_ENGINEER_5						
INTEL	2008	RELIABILITY_ENGINEER_5						
INTEL	2009	RELIABILITY_ENGINEER_5						
INTEL	2010	RELIABILITY_ENGINEER_5						
INTEL	2011	RELIABILITY_ENGINEER_5						
INTEL	2006	RELIABILITY_ENGINEER_6						
INTEL	2007	RELIABILITY_ENGINEER_6						
INTEL	2008	RELIABILITY_ENGINEER_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			(Count)	(Count)	(Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2009	RELIABILITY_ENGINEER_6						
INTEL	2010	RELIABILITY_ENGINEER_6						
INTEL	2011	RELIABILITY_ENGINEER_6						
INTEL	2006	RELIABILITY_ENGINEER_7						
INTEL	2007	RELIABILITY_ENGINEER_7						
INTEL	2008	RELIABILITY_ENGINEER_7						
INTEL	2009	RELIABILITY_ENGINEER_7						
INTEL	2010	RELIABILITY_ENGINEER_7						
INTEL	2011	RELIABILITY_ENGINEER_7						
INTEL	2006	RELIABILITY_ENGINEER_8						
INTEL	2007	RELIABILITY_ENGINEER_8						
INTEL	2008	RELIABILITY_ENGINEER_8						
INTEL	2009	RELIABILITY_ENGINEER_8						
INTEL	2010	RELIABILITY_ENGINEER_8						
INTEL	2011	RELIABILITY_ENGINEER_8						
INTEL	2002	RESEARCH_SCIENTIST_7						
INTEL	2003	RESEARCH_SCIENTIST_7						
INTEL	2004	RESEARCH_SCIENTIST_7						
INTEL	2005	RESEARCH_SCIENTIST_7						
INTEL	2006	RESEARCH_SCIENTIST_7						
INTEL	2007	RESEARCH_SCIENTIST_7						
INTEL	2008	RESEARCH_SCIENTIST_7						
INTEL	2009	RESEARCH_SCIENTIST_7						
INTEL	2010	RESEARCH_SCIENTIST_7						
INTEL	2011	RESEARCH_SCIENTIST_7						
INTEL	2002	RESEARCH_SCIENTIST_8						
INTEL	2003	RESEARCH_SCIENTIST_8						
INTEL	2004	RESEARCH_SCIENTIST_8						
INTEL	2005	RESEARCH_SCIENTIST_8						
INTEL	2006	RESEARCH_SCIENTIST_8						
INTEL	2007	RESEARCH_SCIENTIST_8						
INTEL	2008	RESEARCH_SCIENTIST_8						
INTEL	2009	RESEARCH_SCIENTIST_8						
INTEL	2010	RESEARCH_SCIENTIST_8						
INTEL	2011	RESEARCH_SCIENTIST_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			(Count)	(Count)	(Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	RESEARCH_SCIENTIST_9						
INTEL	2003	RESEARCH_SCIENTIST_9						
INTEL	2004	RESEARCH_SCIENTIST_9						
INTEL	2005	RESEARCH_SCIENTIST_9						
INTEL	2006	RESEARCH_SCIENTIST_9						
INTEL	2007	RESEARCH_SCIENTIST_9						
INTEL	2008	RESEARCH_SCIENTIST_9						
INTEL	2009	RESEARCH_SCIENTIST_9						
INTEL	2010	RESEARCH_SCIENTIST_9						
INTEL	2011	RESEARCH_SCIENTIST_9						
INTEL	2004	RET_DESIGN_ENGINEER_7						
INTEL	2005	RET_DESIGN_ENGINEER_7						
INTEL	2006	RET_DESIGN_ENGINEER_7						
INTEL	2007	RET_DESIGN_ENGINEER_7						
INTEL	2008	RET_DESIGN_ENGINEER_7						
INTEL	2009	RET_DESIGN_ENGINEER_7						
INTEL	2010	RET_DESIGN_ENGINEER_7						
INTEL	2011	RET_DESIGN_ENGINEER_7						
INTEL	2001	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2002	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2003	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2004	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2005	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2006	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2007	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2008	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2009	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2010	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2011	ROTATION_ENGINEERS_PROGRAM_3						
INTEL	2001	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2002	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2003	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2004	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2005	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2006	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2007	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2008	ROTATION_ENGINEERS_PROGRAM_5						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--------(Count)--------		--------------------------(Percent)--------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2009	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2010	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2011	ROTATION_ENGINEERS_PROGRAM_5						
INTEL	2001	SAFETY_ENGINEER_5						
INTEL	2002	SAFETY_ENGINEER_5						
INTEL	2003	SAFETY_ENGINEER_5						
INTEL	2004	SAFETY_ENGINEER_5						
INTEL	2005	SAFETY_ENGINEER_5						
INTEL	2006	SAFETY_ENGINEER_5						
INTEL	2007	SAFETY_ENGINEER_5						
INTEL	2008	SAFETY_ENGINEER_5						
INTEL	2009	SAFETY_ENGINEER_5						
INTEL	2010	SAFETY_ENGINEER_5						
INTEL	2011	SAFETY_ENGINEER_5						
INTEL	2001	SAFETY_ENGINEER_6						
INTEL	2002	SAFETY_ENGINEER_6						
INTEL	2003	SAFETY_ENGINEER_6						
INTEL	2004	SAFETY_ENGINEER_6						
INTEL	2005	SAFETY_ENGINEER_6						
INTEL	2006	SAFETY_ENGINEER_6						
INTEL	2007	SAFETY_ENGINEER_6						
INTEL	2008	SAFETY_ENGINEER_6						
INTEL	2009	SAFETY_ENGINEER_6						
INTEL	2010	SAFETY_ENGINEER_6						
INTEL	2011	SAFETY_ENGINEER_6						
INTEL	2001	SAFETY_ENGINEER_7						
INTEL	2002	SAFETY_ENGINEER_7						
INTEL	2003	SAFETY_ENGINEER_7						
INTEL	2004	SAFETY_ENGINEER_7						
INTEL	2005	SAFETY_ENGINEER_7						
INTEL	2006	SAFETY_ENGINEER_7						
INTEL	2007	SAFETY_ENGINEER_7						
INTEL	2008	SAFETY_ENGINEER_7						
INTEL	2009	SAFETY_ENGINEER_7						
INTEL	2010	SAFETY_ENGINEER_7						
INTEL	2011	SAFETY_ENGINEER_7						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------------------------(Percent)------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	SOFTWARE_ENGINEER_10						
INTEL	2002	SOFTWARE_ENGINEER_10						
INTEL	2004	SOFTWARE_ENGINEER_10						
INTEL	2005	SOFTWARE_ENGINEER_10						
INTEL	2006	SOFTWARE_ENGINEER_10						
INTEL	2007	SOFTWARE_ENGINEER_10						
INTEL	2008	SOFTWARE_ENGINEER_10						
INTEL	2009	SOFTWARE_ENGINEER_10						
INTEL	2010	SOFTWARE_ENGINEER_10						
INTEL	2011	SOFTWARE_ENGINEER_10						
INTEL	2001	SOFTWARE_ENGINEER_3						
INTEL	2002	SOFTWARE_ENGINEER_3						
INTEL	2003	SOFTWARE_ENGINEER_3						
INTEL	2004	SOFTWARE_ENGINEER_3						
INTEL	2005	SOFTWARE_ENGINEER_3						
INTEL	2006	SOFTWARE_ENGINEER_3						
INTEL	2007	SOFTWARE_ENGINEER_3						
INTEL	2008	SOFTWARE_ENGINEER_3						
INTEL	2009	SOFTWARE_ENGINEER_3						
INTEL	2010	SOFTWARE_ENGINEER_3						
INTEL	2011	SOFTWARE_ENGINEER_3						
INTEL	2001	SOFTWARE_ENGINEER_5						
INTEL	2002	SOFTWARE_ENGINEER_5						
INTEL	2003	SOFTWARE_ENGINEER_5						
INTEL	2004	SOFTWARE_ENGINEER_5						
INTEL	2005	SOFTWARE_ENGINEER_5						
INTEL	2006	SOFTWARE_ENGINEER_5						
INTEL	2007	SOFTWARE_ENGINEER_5						
INTEL	2008	SOFTWARE_ENGINEER_5						
INTEL	2009	SOFTWARE_ENGINEER_5						
INTEL	2010	SOFTWARE_ENGINEER_5						
INTEL	2011	SOFTWARE_ENGINEER_5						
INTEL	2001	SOFTWARE_ENGINEER_6						
INTEL	2002	SOFTWARE_ENGINEER_6						
INTEL	2003	SOFTWARE_ENGINEER_6						
INTEL	2004	SOFTWARE_ENGINEER_6						
INTEL	2005	SOFTWARE_ENGINEER_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----			----(Percent)----		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2006	SOFTWARE_ENGINEER_6						
INTEL	2007	SOFTWARE_ENGINEER_6						
INTEL	2008	SOFTWARE_ENGINEER_6						
INTEL	2009	SOFTWARE_ENGINEER_6						
INTEL	2010	SOFTWARE_ENGINEER_6						
INTEL	2011	SOFTWARE_ENGINEER_6						
INTEL	2001	SOFTWARE_ENGINEER_7						
INTEL	2002	SOFTWARE_ENGINEER_7						
INTEL	2003	SOFTWARE_ENGINEER_7						
INTEL	2004	SOFTWARE_ENGINEER_7						
INTEL	2005	SOFTWARE_ENGINEER_7						
INTEL	2006	SOFTWARE_ENGINEER_7						
INTEL	2007	SOFTWARE_ENGINEER_7						
INTEL	2008	SOFTWARE_ENGINEER_7						
INTEL	2009	SOFTWARE_ENGINEER_7						
INTEL	2010	SOFTWARE_ENGINEER_7						
INTEL	2011	SOFTWARE_ENGINEER_7						
INTEL	2001	SOFTWARE_ENGINEER_8						
INTEL	2002	SOFTWARE_ENGINEER_8						
INTEL	2003	SOFTWARE_ENGINEER_8						
INTEL	2004	SOFTWARE_ENGINEER_8						
INTEL	2005	SOFTWARE_ENGINEER_8						
INTEL	2006	SOFTWARE_ENGINEER_8						
INTEL	2007	SOFTWARE_ENGINEER_8						
INTEL	2008	SOFTWARE_ENGINEER_8						
INTEL	2009	SOFTWARE_ENGINEER_8						
INTEL	2010	SOFTWARE_ENGINEER_8						
INTEL	2011	SOFTWARE_ENGINEER_8						
INTEL	2001	SOFTWARE_ENGINEER_9						
INTEL	2002	SOFTWARE_ENGINEER_9						
INTEL	2003	SOFTWARE_ENGINEER_9						
INTEL	2004	SOFTWARE_ENGINEER_9						
INTEL	2005	SOFTWARE_ENGINEER_9						
INTEL	2006	SOFTWARE_ENGINEER_9						
INTEL	2007	SOFTWARE_ENGINEER_9						
INTEL	2008	SOFTWARE_ENGINEER_9						
INTEL	2009	SOFTWARE_ENGINEER_9						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			---(Count)---	---(Count)---	------------(Percent)------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	SOFTWARE_ENGINEER_9						
INTEL	2011	SOFTWARE_ENGINEER_9						
INTEL	2001	SOFTWARE_TECH_54						
INTEL	2002	SOFTWARE_TECH_54						
INTEL	2003	SOFTWARE_TECH_54						
INTEL	2001	SOFTWARE_TECH_55						
INTEL	2002	SOFTWARE_TECH_55						
INTEL	2003	SOFTWARE_TECH_55						
INTEL	2001	SOFTWARE_TECH_56						
INTEL	2002	SOFTWARE_TECH_56						
INTEL	2003	SOFTWARE_TECH_56						
INTEL	2004	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2005	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2006	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2007	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2008	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2009	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2010	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2011	SOLUTIONS_QUALITY_ANALYST_5						
INTEL	2004	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2005	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2006	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2007	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2008	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2009	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2010	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2011	SOLUTIONS_QUALITY_ANALYST_6						
INTEL	2004	SOLUTIONS_QUALITY_ANALYST_7						
INTEL	2005	SOLUTIONS_QUALITY_ANALYST_7						
INTEL	2006	SOLUTIONS_QUALITY_ANALYST_7						
INTEL	2007	SOLUTIONS_QUALITY_ANALYST_7						
INTEL	2008	SOLUTIONS_QUALITY_ANALYST_7						
INTEL	2009	SOLUTIONS_QUALITY_ANALYST_7						
INTEL	2010	SOLUTIONS_QUALITY_ANALYST_7						

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees (Count)	Change from Previous Year (Count)	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
					(Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2011	SOLUTIONS_QUALITY_ANALYST_7						
INTEL	2005	STRATEGIC_PLANNER_10						
INTEL	2006	STRATEGIC_PLANNER_10						
INTEL	2007	STRATEGIC_PLANNER_10						
INTEL	2008	STRATEGIC_PLANNER_10						
INTEL	2009	STRATEGIC_PLANNER_10						
INTEL	2010	STRATEGIC_PLANNER_10						
INTEL	2011	STRATEGIC_PLANNER_10						
INTEL	2005	STRATEGIC_PLANNER_8						
INTEL	2006	STRATEGIC_PLANNER_8						
INTEL	2007	STRATEGIC_PLANNER_8						
INTEL	2008	STRATEGIC_PLANNER_8						
INTEL	2009	STRATEGIC_PLANNER_8						
INTEL	2010	STRATEGIC_PLANNER_8						
INTEL	2011	STRATEGIC_PLANNER_8						
INTEL	2005	STRATEGIC_PLANNER_9						
INTEL	2006	STRATEGIC_PLANNER_9						
INTEL	2007	STRATEGIC_PLANNER_9						
INTEL	2008	STRATEGIC_PLANNER_9						
INTEL	2009	STRATEGIC_PLANNER_9						
INTEL	2010	STRATEGIC_PLANNER_9						
INTEL	2011	STRATEGIC_PLANNER_9						
INTEL	2001	SUPPORT_SPECIALIST_6						
INTEL	2002	SUPPORT_SPECIALIST_6						
INTEL	2003	SUPPORT_SPECIALIST_6						
INTEL	2001	SYSTEMS_ADMINISTRATOR_5						
INTEL	2002	SYSTEMS_ADMINISTRATOR_5						
INTEL	2003	SYSTEMS_ADMINISTRATOR_5						
INTEL	2004	SYSTEMS_ADMINISTRATOR_5						
INTEL	2005	SYSTEMS_ADMINISTRATOR_5						
INTEL	2006	SYSTEMS_ADMINISTRATOR_5						
INTEL	2007	SYSTEMS_ADMINISTRATOR_5						
INTEL	2008	SYSTEMS_ADMINISTRATOR_5						
INTEL	2009	SYSTEMS_ADMINISTRATOR_5						
INTEL	2010	SYSTEMS_ADMINISTRATOR_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			----(Count)----		--------------------------------(Percent)--------------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2011	SYSTEMS_ADMINISTRATOR_5						
INTEL	2001	SYSTEMS_ADMINISTRATOR_6						
INTEL	2002	SYSTEMS_ADMINISTRATOR_6						
INTEL	2003	SYSTEMS_ADMINISTRATOR_6						
INTEL	2004	SYSTEMS_ADMINISTRATOR_6						
INTEL	2005	SYSTEMS_ADMINISTRATOR_6						
INTEL	2006	SYSTEMS_ADMINISTRATOR_6						
INTEL	2007	SYSTEMS_ADMINISTRATOR_6						
INTEL	2008	SYSTEMS_ADMINISTRATOR_6						
INTEL	2009	SYSTEMS_ADMINISTRATOR_6						
INTEL	2010	SYSTEMS_ADMINISTRATOR_6						
INTEL	2011	SYSTEMS_ADMINISTRATOR_6						
INTEL	2002	SYSTEMS_ANALYST_3						
INTEL	2003	SYSTEMS_ANALYST_3						
INTEL	2004	SYSTEMS_ANALYST_3						
INTEL	2005	SYSTEMS_ANALYST_3						
INTEL	2006	SYSTEMS_ANALYST_3						
INTEL	2007	SYSTEMS_ANALYST_3						
INTEL	2008	SYSTEMS_ANALYST_3						
INTEL	2009	SYSTEMS_ANALYST_3						
INTEL	2010	SYSTEMS_ANALYST_3						
INTEL	2011	SYSTEMS_ANALYST_3						
INTEL	2002	SYSTEMS_ANALYST_5						
INTEL	2003	SYSTEMS_ANALYST_5						
INTEL	2004	SYSTEMS_ANALYST_5						
INTEL	2005	SYSTEMS_ANALYST_5						
INTEL	2006	SYSTEMS_ANALYST_5						
INTEL	2007	SYSTEMS_ANALYST_5						
INTEL	2008	SYSTEMS_ANALYST_5						
INTEL	2009	SYSTEMS_ANALYST_5						
INTEL	2010	SYSTEMS_ANALYST_5						
INTEL	2011	SYSTEMS_ANALYST_5						
INTEL	2002	SYSTEMS_ANALYST_6						
INTEL	2003	SYSTEMS_ANALYST_6						
INTEL	2004	SYSTEMS_ANALYST_6						
INTEL	2005	SYSTEMS_ANALYST_6						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			(Count)	(Count)	(Percent)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2006	SYSTEMS_ANALYST_6						
INTEL	2007	SYSTEMS_ANALYST_6						
INTEL	2008	SYSTEMS_ANALYST_6						
INTEL	2009	SYSTEMS_ANALYST_6						
INTEL	2010	SYSTEMS_ANALYST_6						
INTEL	2011	SYSTEMS_ANALYST_6						
INTEL	2002	SYSTEMS_ANALYST_7						
INTEL	2003	SYSTEMS_ANALYST_7						
INTEL	2004	SYSTEMS_ANALYST_7						
INTEL	2005	SYSTEMS_ANALYST_7						
INTEL	2006	SYSTEMS_ANALYST_7						
INTEL	2007	SYSTEMS_ANALYST_7						
INTEL	2008	SYSTEMS_ANALYST_7						
INTEL	2009	SYSTEMS_ANALYST_7						
INTEL	2010	SYSTEMS_ANALYST_7						
INTEL	2011	SYSTEMS_ANALYST_7						
INTEL	2002	SYSTEMS_ANALYST_8						
INTEL	2003	SYSTEMS_ANALYST_8						
INTEL	2004	SYSTEMS_ANALYST_8						
INTEL	2005	SYSTEMS_ANALYST_8						
INTEL	2006	SYSTEMS_ANALYST_8						
INTEL	2007	SYSTEMS_ANALYST_8						
INTEL	2008	SYSTEMS_ANALYST_8						
INTEL	2009	SYSTEMS_ANALYST_8						
INTEL	2010	SYSTEMS_ANALYST_8						
INTEL	2011	SYSTEMS_ANALYST_8						
INTEL	2001	SYSTEMS_ENGINEER_3						
INTEL	2002	SYSTEMS_ENGINEER_3						
INTEL	2003	SYSTEMS_ENGINEER_3						
INTEL	2004	SYSTEMS_ENGINEER_3						
INTEL	2005	SYSTEMS_ENGINEER_3						
INTEL	2006	SYSTEMS_ENGINEER_3						
INTEL	2007	SYSTEMS_ENGINEER_3						
INTEL	2008	SYSTEMS_ENGINEER_3						
INTEL	2009	SYSTEMS_ENGINEER_3						
INTEL	2010	SYSTEMS_ENGINEER_3						
INTEL	2011	SYSTEMS_ENGINEER_3						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----			----(Percent)----		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	SYSTEMS_ENGINEER_5						
INTEL	2002	SYSTEMS_ENGINEER_5						
INTEL	2003	SYSTEMS_ENGINEER_5						
INTEL	2004	SYSTEMS_ENGINEER_5						
INTEL	2005	SYSTEMS_ENGINEER_5						
INTEL	2006	SYSTEMS_ENGINEER_5						
INTEL	2007	SYSTEMS_ENGINEER_5						
INTEL	2008	SYSTEMS_ENGINEER_5						
INTEL	2009	SYSTEMS_ENGINEER_5						
INTEL	2010	SYSTEMS_ENGINEER_5						
INTEL	2011	SYSTEMS_ENGINEER_5						
INTEL	2001	SYSTEMS_ENGINEER_6						
INTEL	2002	SYSTEMS_ENGINEER_6						
INTEL	2003	SYSTEMS_ENGINEER_6						
INTEL	2004	SYSTEMS_ENGINEER_6						
INTEL	2005	SYSTEMS_ENGINEER_6						
INTEL	2006	SYSTEMS_ENGINEER_6						
INTEL	2007	SYSTEMS_ENGINEER_6						
INTEL	2008	SYSTEMS_ENGINEER_6						
INTEL	2009	SYSTEMS_ENGINEER_6						
INTEL	2010	SYSTEMS_ENGINEER_6						
INTEL	2011	SYSTEMS_ENGINEER_6						
INTEL	2001	SYSTEMS_ENGINEER_7						
INTEL	2002	SYSTEMS_ENGINEER_7						
INTEL	2003	SYSTEMS_ENGINEER_7						
INTEL	2004	SYSTEMS_ENGINEER_7						
INTEL	2005	SYSTEMS_ENGINEER_7						
INTEL	2006	SYSTEMS_ENGINEER_7						
INTEL	2007	SYSTEMS_ENGINEER_7						
INTEL	2008	SYSTEMS_ENGINEER_7						
INTEL	2009	SYSTEMS_ENGINEER_7						
INTEL	2010	SYSTEMS_ENGINEER_7						
INTEL	2011	SYSTEMS_ENGINEER_7						
INTEL	2001	SYSTEMS_ENGINEER_8						
INTEL	2002	SYSTEMS_ENGINEER_8						
INTEL	2003	SYSTEMS_ENGINEER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----	----(Count)----		----(Percent)----		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	SYSTEMS_ENGINEER_8						
INTEL	2005	SYSTEMS_ENGINEER_8						
INTEL	2006	SYSTEMS_ENGINEER_8						
INTEL	2007	SYSTEMS_ENGINEER_8						
INTEL	2008	SYSTEMS_ENGINEER_8						
INTEL	2009	SYSTEMS_ENGINEER_8						
INTEL	2010	SYSTEMS_ENGINEER_8						
INTEL	2011	SYSTEMS_ENGINEER_8						
INTEL	2001	SYSTEMS_ENGINEER_9						
INTEL	2002	SYSTEMS_ENGINEER_9						
INTEL	2003	SYSTEMS_ENGINEER_9						
INTEL	2004	SYSTEMS_ENGINEER_9						
INTEL	2005	SYSTEMS_ENGINEER_9						
INTEL	2006	SYSTEMS_ENGINEER_9						
INTEL	2007	SYSTEMS_ENGINEER_9						
INTEL	2008	SYSTEMS_ENGINEER_9						
INTEL	2009	SYSTEMS_ENGINEER_9						
INTEL	2010	SYSTEMS_ENGINEER_9						
INTEL	2011	SYSTEMS_ENGINEER_9						
INTEL	2001	SYSTEMS_PROGRAMMER_3						
INTEL	2002	SYSTEMS_PROGRAMMER_3						
INTEL	2003	SYSTEMS_PROGRAMMER_3						
INTEL	2004	SYSTEMS_PROGRAMMER_3						
INTEL	2005	SYSTEMS_PROGRAMMER_3						
INTEL	2006	SYSTEMS_PROGRAMMER_3						
INTEL	2007	SYSTEMS_PROGRAMMER_3						
INTEL	2008	SYSTEMS_PROGRAMMER_3						
INTEL	2009	SYSTEMS_PROGRAMMER_3						
INTEL	2010	SYSTEMS_PROGRAMMER_3						
INTEL	2011	SYSTEMS_PROGRAMMER_3						
INTEL	2001	SYSTEMS_PROGRAMMER_5						
INTEL	2002	SYSTEMS_PROGRAMMER_5						
INTEL	2003	SYSTEMS_PROGRAMMER_5						
INTEL	2004	SYSTEMS_PROGRAMMER_5						
INTEL	2005	SYSTEMS_PROGRAMMER_5						
INTEL	2006	SYSTEMS_PROGRAMMER_5						
INTEL	2007	SYSTEMS_PROGRAMMER_5						

The column header "Percent Change in Total Compensation from Prior Year" spans columns (f) through (i).

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			(Count)			(Percent)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2008	SYSTEMS_PROGRAMMER_5						
INTEL	2009	SYSTEMS_PROGRAMMER_5						
INTEL	2010	SYSTEMS_PROGRAMMER_5						
INTEL	2011	SYSTEMS_PROGRAMMER_5						
INTEL	2001	SYSTEMS_PROGRAMMER_6						
INTEL	2002	SYSTEMS_PROGRAMMER_6						
INTEL	2003	SYSTEMS_PROGRAMMER_6						
INTEL	2004	SYSTEMS_PROGRAMMER_6						
INTEL	2005	SYSTEMS_PROGRAMMER_6						
INTEL	2006	SYSTEMS_PROGRAMMER_6						
INTEL	2007	SYSTEMS_PROGRAMMER_6						
INTEL	2008	SYSTEMS_PROGRAMMER_6						
INTEL	2009	SYSTEMS_PROGRAMMER_6						
INTEL	2010	SYSTEMS_PROGRAMMER_6						
INTEL	2011	SYSTEMS_PROGRAMMER_6						
INTEL	2001	SYSTEMS_PROGRAMMER_7						
INTEL	2002	SYSTEMS_PROGRAMMER_7						
INTEL	2003	SYSTEMS_PROGRAMMER_7						
INTEL	2004	SYSTEMS_PROGRAMMER_7						
INTEL	2005	SYSTEMS_PROGRAMMER_7						
INTEL	2006	SYSTEMS_PROGRAMMER_7						
INTEL	2007	SYSTEMS_PROGRAMMER_7						
INTEL	2008	SYSTEMS_PROGRAMMER_7						
INTEL	2009	SYSTEMS_PROGRAMMER_7						
INTEL	2010	SYSTEMS_PROGRAMMER_7						
INTEL	2011	SYSTEMS_PROGRAMMER_7						
INTEL	2001	SYSTEMS_PROGRAMMER_8						
INTEL	2002	SYSTEMS_PROGRAMMER_8						
INTEL	2003	SYSTEMS_PROGRAMMER_8						
INTEL	2004	SYSTEMS_PROGRAMMER_8						
INTEL	2005	SYSTEMS_PROGRAMMER_8						
INTEL	2006	SYSTEMS_PROGRAMMER_8						
INTEL	2007	SYSTEMS_PROGRAMMER_8						
INTEL	2008	SYSTEMS_PROGRAMMER_8						
INTEL	2009	SYSTEMS_PROGRAMMER_8						
INTEL	2010	SYSTEMS_PROGRAMMER_8						
INTEL	2011	SYSTEMS_PROGRAMMER_8						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			----(Count)----		----------------(Percent)----------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2004	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2005	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2006	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2007	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2008	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2009	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2010	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2011	SYSTEM_VALIDATION_ENGINEER_5						
INTEL	2004	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2005	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2006	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2007	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2008	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2009	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2010	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2011	SYSTEM_VALIDATION_ENGINEER_6						
INTEL	2004	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2005	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2006	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2007	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2008	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2009	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2010	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2011	SYSTEM_VALIDATION_ENGINEER_7						
INTEL	2004	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2005	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2006	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2007	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2008	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2009	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2010	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2011	SYSTEM_VALIDATION_ENGINEER_8						
INTEL	2007	TECHNICAL_INFLUENCER_SALES_84						
INTEL	2008	TECHNICAL_INFLUENCER_SALES_84						
INTEL	2009	TECHNICAL_INFLUENCER_SALES_84						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			---(Count)---			---(Percent)---		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2010	TECHNICAL_INFLUENCER_SALES_84						
INTEL	2011	TECHNICAL_INFLUENCER_SALES_84						
INTEL	2001	TECHNICAL_MKT_ENGINEER_3						
INTEL	2002	TECHNICAL_MKT_ENGINEER_3						
INTEL	2003	TECHNICAL_MKT_ENGINEER_3						
INTEL	2004	TECHNICAL_MKT_ENGINEER_3						
INTEL	2005	TECHNICAL_MKT_ENGINEER_3						
INTEL	2006	TECHNICAL_MKT_ENGINEER_3						
INTEL	2007	TECHNICAL_MKT_ENGINEER_3						
INTEL	2008	TECHNICAL_MKT_ENGINEER_3						
INTEL	2009	TECHNICAL_MKT_ENGINEER_3						
INTEL	2010	TECHNICAL_MKT_ENGINEER_3						
INTEL	2011	TECHNICAL_MKT_ENGINEER_3						
INTEL	2001	TECHNICAL_MKT_ENGINEER_5						
INTEL	2002	TECHNICAL_MKT_ENGINEER_5						
INTEL	2003	TECHNICAL_MKT_ENGINEER_5						
INTEL	2004	TECHNICAL_MKT_ENGINEER_5						
INTEL	2005	TECHNICAL_MKT_ENGINEER_5						
INTEL	2006	TECHNICAL_MKT_ENGINEER_5						
INTEL	2007	TECHNICAL_MKT_ENGINEER_5						
INTEL	2008	TECHNICAL_MKT_ENGINEER_5						
INTEL	2009	TECHNICAL_MKT_ENGINEER_5						
INTEL	2010	TECHNICAL_MKT_ENGINEER_5						
INTEL	2011	TECHNICAL_MKT_ENGINEER_5						
INTEL	2001	TECHNICAL_MKT_ENGINEER_6						
INTEL	2002	TECHNICAL_MKT_ENGINEER_6						
INTEL	2003	TECHNICAL_MKT_ENGINEER_6						
INTEL	2004	TECHNICAL_MKT_ENGINEER_6						
INTEL	2005	TECHNICAL_MKT_ENGINEER_6						
INTEL	2006	TECHNICAL_MKT_ENGINEER_6						
INTEL	2007	TECHNICAL_MKT_ENGINEER_6						
INTEL	2008	TECHNICAL_MKT_ENGINEER_6						
INTEL	2009	TECHNICAL_MKT_ENGINEER_6						
INTEL	2010	TECHNICAL_MKT_ENGINEER_6						
INTEL	2011	TECHNICAL_MKT_ENGINEER_6						
INTEL	2001	TECHNICAL_MKT_ENGINEER_7						

Percent Change in Total Compensation from Prior Year

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			----(Count)----			----------------------(Percent)----------------------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	TECHNICAL_MKT_ENGINEER_7						
INTEL	2003	TECHNICAL_MKT_ENGINEER_7						
INTEL	2004	TECHNICAL_MKT_ENGINEER_7						
INTEL	2005	TECHNICAL_MKT_ENGINEER_7						
INTEL	2006	TECHNICAL_MKT_ENGINEER_7						
INTEL	2007	TECHNICAL_MKT_ENGINEER_7						
INTEL	2008	TECHNICAL_MKT_ENGINEER_7						
INTEL	2009	TECHNICAL_MKT_ENGINEER_7						
INTEL	2010	TECHNICAL_MKT_ENGINEER_7						
INTEL	2011	TECHNICAL_MKT_ENGINEER_7						
INTEL	2001	TECHNICAL_MKT_ENGINEER_8						
INTEL	2002	TECHNICAL_MKT_ENGINEER_8						
INTEL	2003	TECHNICAL_MKT_ENGINEER_8						
INTEL	2004	TECHNICAL_MKT_ENGINEER_8						
INTEL	2005	TECHNICAL_MKT_ENGINEER_8						
INTEL	2006	TECHNICAL_MKT_ENGINEER_8						
INTEL	2007	TECHNICAL_MKT_ENGINEER_8						
INTEL	2008	TECHNICAL_MKT_ENGINEER_8						
INTEL	2009	TECHNICAL_MKT_ENGINEER_8						
INTEL	2010	TECHNICAL_MKT_ENGINEER_8						
INTEL	2011	TECHNICAL_MKT_ENGINEER_8						
INTEL	2001	TECHNICAL_MKT_ENGINEER_9						
INTEL	2002	TECHNICAL_MKT_ENGINEER_9						
INTEL	2003	TECHNICAL_MKT_ENGINEER_9						
INTEL	2004	TECHNICAL_MKT_ENGINEER_9						
INTEL	2005	TECHNICAL_MKT_ENGINEER_9						
INTEL	2006	TECHNICAL_MKT_ENGINEER_9						
INTEL	2007	TECHNICAL_MKT_ENGINEER_9						
INTEL	2008	TECHNICAL_MKT_ENGINEER_9						
INTEL	2009	TECHNICAL_MKT_ENGINEER_9						
INTEL	2010	TECHNICAL_MKT_ENGINEER_9						
INTEL	2011	TECHNICAL_MKT_ENGINEER_9						
INTEL	2001	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2002	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2003	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2004	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2005	TECHNICAL_MKT_ENGINEER_MANAGER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			------(Count)------			---------------(Percent)---------------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2006	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2007	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2008	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2009	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2010	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2011	TECHNICAL_MKT_ENGINEER_MANAGER_8						
INTEL	2001	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2002	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2003	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2004	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2005	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2006	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2007	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2008	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2009	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2010	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2011	TECHNICAL_MKT_ENGINEER_MANAGER_9						
INTEL	2001	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2002	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2003	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2004	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2005	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2006	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2007	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2008	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2009	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2010	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2011	TECHNICAL_TRAINING_ENGINEER_6						
INTEL	2001	TECHNICAL_WRITER_3						
INTEL	2002	TECHNICAL_WRITER_3						
INTEL	2003	TECHNICAL_WRITER_3						
INTEL	2004	TECHNICAL_WRITER_3						
INTEL	2005	TECHNICAL_WRITER_3						
INTEL	2006	TECHNICAL_WRITER_3						
INTEL	2007	TECHNICAL_WRITER_3						
INTEL	2008	TECHNICAL_WRITER_3						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
					Percent Change in Total Compensation from Prior Year			
			------(Count)------		------(Percent)------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	TECHNICAL_WRITER_5						
INTEL	2002	TECHNICAL_WRITER_5						
INTEL	2003	TECHNICAL_WRITER_5						
INTEL	2004	TECHNICAL_WRITER_5						
INTEL	2005	TECHNICAL_WRITER_5						
INTEL	2006	TECHNICAL_WRITER_5						
INTEL	2007	TECHNICAL_WRITER_5						
INTEL	2008	TECHNICAL_WRITER_5						
INTEL	2001	TECHNICAL_WRITER_6						
INTEL	2002	TECHNICAL_WRITER_6						
INTEL	2003	TECHNICAL_WRITER_6						
INTEL	2004	TECHNICAL_WRITER_6						
INTEL	2005	TECHNICAL_WRITER_6						
INTEL	2006	TECHNICAL_WRITER_6						
INTEL	2007	TECHNICAL_WRITER_6						
INTEL	2008	TECHNICAL_WRITER_6						
INTEL	2001	TECHNICAL_WRITER_7						
INTEL	2002	TECHNICAL_WRITER_7						
INTEL	2003	TECHNICAL_WRITER_7						
INTEL	2004	TECHNICAL_WRITER_7						
INTEL	2005	TECHNICAL_WRITER_7						
INTEL	2006	TECHNICAL_WRITER_7						
INTEL	2007	TECHNICAL_WRITER_7						
INTEL	2008	TECHNICAL_WRITER_7						
INTEL	2001	TEST_ENGINEER_3						
INTEL	2002	TEST_ENGINEER_3						
INTEL	2003	TEST_ENGINEER_3						
INTEL	2004	TEST_ENGINEER_3						
INTEL	2005	TEST_ENGINEER_3						
INTEL	2006	TEST_ENGINEER_3						
INTEL	2007	TEST_ENGINEER_3						
INTEL	2008	TEST_ENGINEER_3						
INTEL	2009	TEST_ENGINEER_3						
INTEL	2010	TEST_ENGINEER_3						
INTEL	2011	TEST_ENGINEER_3						
INTEL	2001	TEST_ENGINEER_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--		--(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2002	TEST_ENGINEER_5						
INTEL	2003	TEST_ENGINEER_5						
INTEL	2004	TEST_ENGINEER_5						
INTEL	2005	TEST_ENGINEER_5						
INTEL	2006	TEST_ENGINEER_5						
INTEL	2007	TEST_ENGINEER_5						
INTEL	2008	TEST_ENGINEER_5						
INTEL	2009	TEST_ENGINEER_5						
INTEL	2010	TEST_ENGINEER_5						
INTEL	2011	TEST_ENGINEER_5						
INTEL	2001	TEST_ENGINEER_6						
INTEL	2002	TEST_ENGINEER_6						
INTEL	2003	TEST_ENGINEER_6						
INTEL	2004	TEST_ENGINEER_6						
INTEL	2005	TEST_ENGINEER_6						
INTEL	2006	TEST_ENGINEER_6						
INTEL	2007	TEST_ENGINEER_6						
INTEL	2008	TEST_ENGINEER_6						
INTEL	2009	TEST_ENGINEER_6						
INTEL	2010	TEST_ENGINEER_6						
INTEL	2011	TEST_ENGINEER_6						
INTEL	2001	TEST_ENGINEER_7						
INTEL	2002	TEST_ENGINEER_7						
INTEL	2003	TEST_ENGINEER_7						
INTEL	2004	TEST_ENGINEER_7						
INTEL	2005	TEST_ENGINEER_7						
INTEL	2006	TEST_ENGINEER_7						
INTEL	2007	TEST_ENGINEER_7						
INTEL	2008	TEST_ENGINEER_7						
INTEL	2009	TEST_ENGINEER_7						
INTEL	2010	TEST_ENGINEER_7						
INTEL	2011	TEST_ENGINEER_7						
INTEL	2001	TEST_ENGINEER_8						
INTEL	2002	TEST_ENGINEER_8						
INTEL	2003	TEST_ENGINEER_8						
INTEL	2004	TEST_ENGINEER_8						
INTEL	2005	TEST_ENGINEER_8						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
			(Count)	(Count)		(Percent)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
					Percent Change in Total Compensation from Prior Year			
INTEL	2006	TEST_ENGINEER_8						
INTEL	2007	TEST_ENGINEER_8						
INTEL	2008	TEST_ENGINEER_8						
INTEL	2009	TEST_ENGINEER_8						
INTEL	2010	TEST_ENGINEER_8						
INTEL	2011	TEST_ENGINEER_8						
INTEL	2005	TEST_R&D_ENGINEER_5						
INTEL	2006	TEST_R&D_ENGINEER_5						
INTEL	2007	TEST_R&D_ENGINEER_5						
INTEL	2008	TEST_R&D_ENGINEER_5						
INTEL	2009	TEST_R&D_ENGINEER_5						
INTEL	2010	TEST_R&D_ENGINEER_5						
INTEL	2011	TEST_R&D_ENGINEER_5						
INTEL	2005	TEST_R&D_ENGINEER_6						
INTEL	2006	TEST_R&D_ENGINEER_6						
INTEL	2007	TEST_R&D_ENGINEER_6						
INTEL	2008	TEST_R&D_ENGINEER_6						
INTEL	2009	TEST_R&D_ENGINEER_6						
INTEL	2010	TEST_R&D_ENGINEER_6						
INTEL	2011	TEST_R&D_ENGINEER_6						
INTEL	2005	TEST_R&D_ENGINEER_7						
INTEL	2006	TEST_R&D_ENGINEER_7						
INTEL	2007	TEST_R&D_ENGINEER_7						
INTEL	2008	TEST_R&D_ENGINEER_7						
INTEL	2009	TEST_R&D_ENGINEER_7						
INTEL	2010	TEST_R&D_ENGINEER_7						
INTEL	2011	TEST_R&D_ENGINEER_7						
INTEL	2005	TEST_R&D_ENGINEER_8						
INTEL	2006	TEST_R&D_ENGINEER_8						
INTEL	2007	TEST_R&D_ENGINEER_8						
INTEL	2008	TEST_R&D_ENGINEER_8						
INTEL	2009	TEST_R&D_ENGINEER_8						
INTEL	2010	TEST_R&D_ENGINEER_8						
INTEL	2011	TEST_R&D_ENGINEER_8						
INTEL	2005	TEST_R&D_ENGINEER_9						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--	--(Percent)--			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2006	TEST_R&D_ENGINEER_9						
INTEL	2007	TEST_R&D_ENGINEER_9						
INTEL	2008	TEST_R&D_ENGINEER_9						
INTEL	2009	TEST_R&D_ENGINEER_9						
INTEL	2010	TEST_R&D_ENGINEER_9						
INTEL	2011	TEST_R&D_ENGINEER_9						
INTEL	2001	WEB_APPLICATIONS_DEVELOPER_5						
INTEL	2002	WEB_APPLICATIONS_DEVELOPER_5						
INTEL	2003	WEB_APPLICATIONS_DEVELOPER_5						
INTEL	2004	WEB_APPLICATIONS_DEVELOPER_5						
INTEL	2005	WEB_APPLICATIONS_DEVELOPER_5						
INTEL	2006	WEB_APPLICATIONS_DEVELOPER_5						
INTEL	2007	WEB_APPLICATIONS_DEVELOPER_5						
INTEL	2001	WEB_APPLICATIONS_DEVELOPER_6						
INTEL	2002	WEB_APPLICATIONS_DEVELOPER_6						
INTEL	2003	WEB_APPLICATIONS_DEVELOPER_6						
INTEL	2004	WEB_APPLICATIONS_DEVELOPER_6						
INTEL	2005	WEB_APPLICATIONS_DEVELOPER_6						
INTEL	2006	WEB_APPLICATIONS_DEVELOPER_6						
INTEL	2001	WEB_DESIGNER_5						
INTEL	2002	WEB_DESIGNER_5						
INTEL	2003	WEB_DESIGNER_5						
INTEL	2004	WEB_DESIGNER_5						
INTEL	2005	WEB_DESIGNER_5						
INTEL	2006	WEB_DESIGNER_5						
INTEL	2007	WEB_DESIGNER_5						
INTEL	2009	WEB_DESIGNER_5						
INTEL	2004	YIELD_ENGINEER_5						
INTEL	2005	YIELD_ENGINEER_5						
INTEL	2006	YIELD_ENGINEER_5						
INTEL	2007	YIELD_ENGINEER_5						
INTEL	2008	YIELD_ENGINEER_5						
INTEL	2009	YIELD_ENGINEER_5						
INTEL	2010	YIELD_ENGINEER_5						
INTEL	2011	YIELD_ENGINEER_5						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees ----(Count)----	Change from Previous Year	Minimum	25th Percentile ------(Percent)------	75th Percentile	Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTEL	2001	YIELD_ENGINEER_6						
INTEL	2002	YIELD_ENGINEER_6						
INTEL	2003	YIELD_ENGINEER_6						
INTEL	2004	YIELD_ENGINEER_6						
INTEL	2005	YIELD_ENGINEER_6						
INTEL	2006	YIELD_ENGINEER_6						
INTEL	2007	YIELD_ENGINEER_6						
INTEL	2008	YIELD_ENGINEER_6						
INTEL	2009	YIELD_ENGINEER_6						
INTEL	2010	YIELD_ENGINEER_6						
INTEL	2011	YIELD_ENGINEER_6						
INTEL	2002	YIELD_ENGINEER_7						
INTEL	2003	YIELD_ENGINEER_7						
INTEL	2004	YIELD_ENGINEER_7						
INTEL	2005	YIELD_ENGINEER_7						
INTEL	2006	YIELD_ENGINEER_7						
INTEL	2007	YIELD_ENGINEER_7						
INTEL	2008	YIELD_ENGINEER_7						
INTEL	2009	YIELD_ENGINEER_7						
INTEL	2010	YIELD_ENGINEER_7						
INTEL	2011	YIELD_ENGINEER_7						
INTEL	2004	YIELD_ENGINEER_8						
INTEL	2005	YIELD_ENGINEER_8						
INTEL	2006	YIELD_ENGINEER_8						
INTEL	2007	YIELD_ENGINEER_8						
INTEL	2008	YIELD_ENGINEER_8						
INTEL	2009	YIELD_ENGINEER_8						
INTEL	2010	YIELD_ENGINEER_8						
INTEL	2011	YIELD_ENGINEER_8						
INTUIT				13	-46.7	2.0	14.5	21.2
INTUIT				16	-14.1	-5.7	7.0	38.7
INTUIT				2	-7.2	11.0	21.2	40.7
INTUIT				9	-19.2	-1.3	8.8	32.0
INTUIT				13	-29.6	-0.7	12.2	50.4
INTUIT				0	-22.7	-8.3	3.8	56.1
INTUIT				1	-25.4	7.0	32.9	43.2
INTUIT								

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------------------------------------(Percent)------------------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				-3	-28.2	-8.5	5.0	39.2
INTUIT				2	-2.6	-2.6	17.2	17.2
INTUIT				9	-3.1	3.3	17.3	20.4
INTUIT				6	-13.1	7.3	27.1	46.8
INTUIT				-4	-14.4	-7.1	7.8	13.8
INTUIT				-4	-4.8	1.3	13.7	30.3
INTUIT				-2	-16.2	-8.9	6.0	9.5
INTUIT				18	-38.5	-38.5	-19.6	-19.6
INTUIT				-2	-27.1	-3.6	15.3	36.6
INTUIT				3	-7.4	-1.0	16.5	24.3
INTUIT				-22	3.1	3.1	12.1	12.1
INTUIT				8	-6.6	-1.4	3.8	4.5
INTUIT				4	-3.4	3.3	12.7	33.0
INTUIT				-3	-6.8	-2.7	3.0	25.1
INTUIT				1	-6.4	4.1	14.3	30.3
INTUIT				-2	-13.9	-2.0	7.7	26.2
INTUIT				-1	-25.4	-14.5	15.6	46.3
INTUIT				1	-18.1	-12.2	-1.4	39.9
INTUIT				7	-16.3	8.0	38.4	79.7
INTUIT				3	-41.0	-8.0	6.1	32.0
INTUIT				4	-49.5	-43.6	-32.1	88.4
INTUIT				0	-40.5	-0.1	50.1	160.3
INTUIT				1	-26.6	-17.2	21.2	130.2
INTUIT				3	-25.7	-13.2	-4.0	71.4
INTUIT				4	-31.8	8.2	30.6	139.4
INTUIT				-17	-0.1	3.8	32.0	39.0
INTUIT				-8	-19.8	4.2	14.8	20.4
INTUIT								
INTUIT				-1	38.2	38.2	38.2	38.2

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
				(Count)	Minimum	(Percent)		Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				6	-54.0	-46.9	-23.4	59.1
INTUIT				-3	-28.6	11.4	41.8	86.4
INTUIT				4	-28.2	-13.7	10.2	22.6
INTUIT				7	-18.3	-13.8	6.4	23.0
INTUIT				-2	-2.7	10.7	23.8	75.8
INTUIT				5	-22.9	-4.4	19.6	22.8
INTUIT				0	-16.5	3.1	25.9	69.7
INTUIT				3	-16.9	-11.7	-1.6	54.7
INTUIT				-2	-20.3	-3.9	39.4	67.6
INTUIT				7	-19.4	-6.2	26.3	120.8
INTUIT				-3	-46.7	-38.6	-20.2	-8.0
INTUIT				1	-31.9	0.7	25.1	52.0
INTUIT				-5	0.2	2.7	14.5	23.1
INTUIT				-11	-21.2	2.4	5.1	7.0
INTUIT				10	-15.6	-0.2	15.1	57.4
INTUIT				20	-18.7	-10.0	2.9	48.8
INTUIT				-4	-12.2	4.7	20.8	41.8
INTUIT				26	-28.1	-8.0	7.6	33.6
INTUIT				25	-8.2	-2.2	17.8	34.1
INTUIT				-4	-12.8	-1.6	13.0	45.9
INTUIT				9	-20.9	-11.8	1.8	13.1
INTUIT				-1	-13.8	2.3	16.7	56.4
INTUIT				-6	-15.0	-3.6	18.8	51.1
INTUIT				43	9.0	10.9	26.2	28.8
INTUIT				-26	-12.6	-6.3	16.8	25.4
INTUIT				-11	1.3	9.3	22.8	44.0
INTUIT				-15				
INTUIT				0				
INTUIT				1				
INTUIT								

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			--(Count)--	--(Count)--		--------(Percent)--------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				18	2.3	7.8	27.7	44.6
INTUIT				-17	-2.0	4.6	20.2	27.3
INTUIT				-1	-3.5	-1.3	8.8	32.4
INTUIT				-5	-16.5	-16.5	-3.9	-3.9
INTUIT				-1	-4.3	-4.3	18.4	18.4
INTUIT				0	-7.7	-7.7	10.6	10.6
INTUIT				-20	-58.1	-40.8	-25.7	-15.8
INTUIT				11	-11.1	14.9	31.6	54.5
INTUIT				2	-22.6	-1.1	21.2	55.9
INTUIT				-15	-21.9	-12.1	4.1	34.3
INTUIT				-22	12.9	12.9	21.0	21.0
INTUIT				11	-10.7	-1.6	15.9	53.7
INTUIT				14	-37.8	-9.6	2.5	15.3
INTUIT				9	-12.2	4.1	28.4	97.1
INTUIT				8	-27.6	-13.0	17.2	87.7
INTUIT				46	1.9	3.2	20.3	30.7
INTUIT				-40	-13.4	-6.7	11.8	30.4
INTUIT				-12	-5.3	13.8	26.4	66.7
INTUIT				12	-9.4	-1.9	3.0	30.5
INTUIT				-3	-10.1	-0.4	14.7	42.1
INTUIT				-7	-17.8	-6.1	-1.5	27.4
INTUIT				1	-7.3	5.6	15.3	44.5
INTUIT				6	-56.6	-42.7	-21.6	76.9
INTUIT				-1	-31.9	-8.0	21.7	45.4
INTUIT				-13	-26.0	0.6	19.1	44.8
INTUIT				-18	-12.3	-6.3	21.2	30.0
INTUIT				-11	7.1	7.1	22.0	22.0
INTUIT				0				
INTUIT				-1	25.2	25.2	25.2	25.2

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

			Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
Employer	Year	Job Title	--(Count)--	--(Count)--		--(Percent)--		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				7	0.0	10.7	26.0	40.2
INTUIT				20	-10.6	5.0	15.9	28.1
INTUIT				-1	-6.8	3.4	23.8	64.7
INTUIT				-4	-19.0	-6.4	4.3	28.1
INTUIT				2	-12.9	2.9	19.5	44.8
INTUIT				14	-15.9	-4.7	6.4	72.1
INTUIT				-58	-30.3	-26.6	-4.3	0.3
INTUIT				0	-10.3	-10.3	16.2	16.2
INTUIT				-3	24.9	24.9	29.2	29.2
INTUIT				-1	21.1	21.1	21.1	21.1
INTUIT				9	-50.9	-45.1	-20.1	7.7
INTUIT				-10	-39.5	-11.7	7.6	25.1
INTUIT				-20	-11.8	-1.9	4.1	15.2
INTUIT				-3	-24.2	0.2	8.6	31.3
INTUIT				-11	-18.0	1.6	13.9	30.4
INTUIT				-21	-14.0	7.0	16.5	67.4
INTUIT				46	-12.4	-3.9	8.8	28.5
INTUIT				-28	-12.6	2.8	14.9	48.4
INTUIT				-164				
INTUIT				-5				
INTUIT				1	-3.4	-3.4	-3.4	-3.4
INTUIT				35	-62.9	-27.2	-4.1	10.2
INTUIT				-60	-0.6	0.6	14.9	31.6
INTUIT				-24	-9.5	-9.5	-9.5	-9.5
INTUIT				40	-58.7	-36.7	-9.1	56.4
INTUIT				-102	-3.6	0.0	27.9	41.0
INTUIT				-28	-14.2	-7.8	17.3	21.6
INTUIT				-5	0.7	1.7	4.2	7.6

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
				(Count)	Minimum	25th Percentile	75th Percentile	Maximum
							(Percent)	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT								
INTUIT				-4	1.6	1.6	1.6	1.6
INTUIT				-10	-25.3	4.0	18.5	64.0
INTUIT				-32	-25.6	-7.8	4.1	47.8
INTUIT				48	-62.2	-44.8	-24.1	127.3
INTUIT				-121	-15.0	0.4	14.6	26.0
INTUIT				-27	-25.9	-5.2	13.0	42.3
INTUIT				-13	-7.8	3.1	10.5	13.1
INTUIT				-4	3.4	12.2	17.1	17.7
INTUIT				25	-65.3	-46.5	-25.8	14.9
INTUIT				-84	-31.8	-0.2	24.9	36.8
INTUIT				-17	-18.3	-8.3	13.9	39.8
INTUIT				-6	-16.0	-10.3	3.0	24.5
INTUIT				-4	7.0	7.0	15.0	25.2
INTUIT				5	-52.1	-46.4	-33.7	-5.6
INTUIT				-26	15.6	22.1	34.4	35.4
INTUIT				-2	-17.7	-13.6	11.0	28.3
INTUIT				-1	0.8	0.8	11.8	11.8
INTUIT				5	-19.4	-1.3	14.6	20.4
INTUIT				2	-10.0	0.1	5.1	14.9
INTUIT				6	-3.7	8.0	15.6	36.7
INTUIT				-20	-13.7	-1.2	8.6	34.8
INTUIT				0	-16.1	-1.6	15.8	37.5
INTUIT				-53				
INTUIT				5	-28.5	-18.6	0.1	22.7
INTUIT				-26	1.2	1.2	1.2	1.2
INTUIT				-3	20.6	20.6	20.6	20.6
INTUIT				-1	0.5	0.5	0.5	0.5
INTUIT								

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
				------(Count)------	--------------------------(Percent)--------------------------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				-11	-66.0	-24.4	-4.4	9.6
INTUIT				-41	-0.5	2.2	11.8	19.9
INTUIT				-19	-10.4	-2.3	24.4	32.2
INTUIT				26	-51.0	-30.7	-3.4	25.3
INTUIT				-72	-1.2	1.3	10.4	25.8
INTUIT				-14	-9.4	1.0	15.2	30.9
INTUIT				-5	3.5	3.5	3.8	3.8
INTUIT				15	-56.2	-39.0	-4.4	103.9
INTUIT				-35	-20.2	-9.0	14.0	20.4
INTUIT				-11	-4.9	-3.9	4.9	6.4
INTUIT				-3	5.1	5.1	5.2	5.2
INTUIT				0	11.4	11.4	15.7	15.7
INTUIT				-1	-11.4	-11.4	-11.4	-11.4
INTUIT				0	6.8	6.8	6.8	6.8
INTUIT				8	-65.1	-49.0	-10.8	129.5
INTUIT				-24	3.5	3.5	19.8	19.8
INTUIT				-4	-4.2	-4.2	43.6	43.6
INTUIT				-2	3.7	3.7	3.7	3.7
INTUIT				17	-23.3	-12.5	4.9	22.7
INTUIT				3	-9.2	2.4	9.9	20.3
INTUIT				-2	-13.0	-1.2	6.6	37.2
INTUIT				6	0.2	4.9	14.6	18.2
INTUIT				3	-4.1	-0.6	24.7	39.4
INTUIT				7	-5.8	-2.9	7.1	14.9
INTUIT				6	-1.9	5.2	14.8	31.0
INTUIT				3	-11.2	-4.0	10.2	25.3
INTUIT								

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
				(Count)	(Percent)	(Percent)	(Percent)	(Percent)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				7	-1.3	1.1	14.6	20.6
INTUIT				7	-12.2	-1.3	13.7	22.8
INTUIT				-1	-9.5	-3.2	5.4	55.4
INTUIT				3	-0.6	8.8	18.3	31.1
INTUIT				1	-16.9	-6.5	15.2	37.0
INTUIT				1				
INTUIT				22	-10.2	-10.2	2.3	2.3
INTUIT				-3	-12.5	-4.1	12.2	33.1
INTUIT				3	-3.8	2.6	22.2	47.8
INTUIT				6	-15.8	-11.1	3.1	31.8
INTUIT				9	-13.6	-11.4	17.2	47.8
INTUIT				6	-19.2	-5.5	13.4	31.7
INTUIT				2	-32.1	-13.9	0.1	76.8
INTUIT				1	-5.3	13.4	34.3	45.2
INTUIT				29	-45.6	-39.8	-21.0	-14.6
INTUIT				6	-35.8	2.7	32.1	112.4
INTUIT				-6	-39.3	-6.6	15.7	55.3
INTUIT				-2	-23.1	-5.1	9.5	29.9
INTUIT				-34	4.6	4.6	7.3	7.3
INTUIT				11	-55.1	-38.1	-17.4	50.5
INTUIT				9	-31.0	-17.5	19.9	40.1
INTUIT				6	-7.6	0.3	17.7	43.7
INTUIT				5	-10.9	-3.7	15.9	47.2
INTUIT				-1	-9.8	10.7	20.9	33.7
INTUIT				7	-6.1	2.5	16.0	47.5
INTUIT				9	-19.7	1.7	21.4	58.5
INTUIT				-1	-23.3	-8.2	2.6	46.8
INTUIT				4	-15.6	6.0	32.4	89.1
INTUIT				11	-24.3	-10.0	12.2	69.9
INTUIT				8	4.6	14.0	35.9	43.2

Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year (Percent)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				8	-11.7	-0.6	13.4	30.9
INTUIT				7	-17.3	0.8	19.9	44.7
INTUIT				-6	-12.4	-5.7	3.9	40.2
INTUIT				-1	-10.5	5.8	15.7	41.4
INTUIT				-2	-27.1	-13.1	3.8	49.3
INTUIT				-2	-46.2	-46.2	-46.2	-46.2
INTUIT				185				
INTUIT				86	-22.0	-1.4	15.2	41.1
INTUIT				35	-22.6	-4.8	6.1	34.2
INTUIT				77	-11.0	6.7	16.5	51.0
INTUIT				60	-23.1	1.1	14.6	46.3
INTUIT				5	-22.6	1.4	18.4	80.2
INTUIT				-155	-26.6	-5.8	3.8	23.9
INTUIT				-1	-12.6	3.6	15.9	84.6
INTUIT				55	-35.0	-9.0	3.9	58.8
INTUIT				15	-26.8	-4.4	4.2	30.0
INTUIT				28	-16.6	-3.5	10.5	26.4
INTUIT				18	-9.6	6.1	20.0	44.2
INTUIT				18	-19.4	1.5	14.4	49.2
INTUIT				-4	-9.7	2.4	15.5	45.7
INTUIT				17	-14.1	1.8	18.4	40.0
INTUIT				32	-32.0	-11.4	3.1	59.1
INTUIT				-11	-6.6	7.0	14.0	32.2
INTUIT				2	-17.8	-3.6	1.9	18.4
INTUIT				21	10.4	10.4	14.7	14.7
INTUIT				16	-12.6	-1.9	10.0	25.8
INTUIT				-12	-10.4	-2.3	4.9	28.3
INTUIT				-2	-6.9	7.1	12.3	43.1
INTUIT				5	-13.4	-2.1	3.0	28.6

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees (Count)	Change from Previous Year (Count)	Minimum	25th Percentile	75th Percentile	Maximum
							Percent Change in Total Compensation from Prior Year (Percent)	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				0	-10.6	-3.0	8.0	25.4
INTUIT				0	-7.6	5.8	14.6	25.4
INTUIT				2	-4.7	3.9	13.3	26.1
INTUIT				-7	-12.4	-0.6	6.5	14.8
INTUIT				-31	-7.9	-7.9	2.9	2.9
INTUIT				3	1.5	1.5	18.9	18.9
INTUIT				-1	-5.5	-5.5	-5.1	-5.1
INTUIT				3	-2.9	3.2	9.9	40.1
INTUIT				2	-12.9	-1.3	9.8	29.0
INTUIT				10	-4.8	2.3	15.0	23.5
INTUIT				-5	-4.3	6.1	15.9	26.8
INTUIT				-1				
INTUIT				20	13.1	13.1	13.1	13.1
INTUIT				-1	-19.3	-3.9	5.4	20.4
INTUIT				-1	-5.9	-0.3	22.0	39.3
INTUIT				8	-24.3	-10.6	15.6	32.4
INTUIT				15	-31.8	1.8	13.3	48.4
INTUIT				30	-17.9	-6.3	5.9	42.3
INTUIT				30	-22.5	5.1	21.5	83.3
INTUIT				25	-22.4	2.6	16.8	46.0
INTUIT				33	-27.2	0.6	17.7	97.7
INTUIT				-9	-23.3	-7.5	2.1	25.4
INTUIT				9	-18.3	4.4	22.6	69.1
INTUIT				9	-30.6	-11.3	5.1	53.4
INTUIT				12	-0.1	3.7	33.0	44.8
INTUIT				6	-14.9	7.9	22.5	36.6
INTUIT				-2	-7.4	-0.1	4.3	67.6
INTUIT				5	-14.9	-1.4	30.4	36.4
INTUIT				3	-20.7	-13.3	9.6	102.2

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------		------(Percent)------			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
INTUIT				36	-5.3	-3.4	4.9	10.8
INTUIT				2	-21.1	-7.7	13.2	33.2
INTUIT				-5	-12.6	-5.5	4.8	21.4
INTUIT				-1	-7.6	10.3	27.9	63.4
INTUIT				2	-28.9	-8.5	1.8	36.8
INTUIT				-1	-16.3	3.7	16.0	47.6
INTUIT				-10	-22.3	-10.3	2.2	55.4
INTUIT				-1	-32.4	-32.4	-32.4	-32.4
INTUIT				0	2.9	2.9	2.9	2.9
INTUIT				35	11.1	11.1	11.1	11.1
INTUIT				-11	26.7	26.7	26.7	26.7
INTUIT				3	-7.6	3.8	9.4	21.3
INTUIT				-1	-9.5	-1.1	5.3	35.2
INTUIT				-2	-5.2	3.9	11.0	33.5
INTUIT				-1	-4.5	1.7	7.4	13.8
INTUIT				-1	-50.8	-38.9	2.8	16.8
INTUIT				6	-8.9	2.4	17.8	58.8
INTUIT				-35	3.0	3.2	9.7	14.0
INTUIT				-5	-9.7	-8.2	9.2	13.9
INTUIT				-4	2.0	2.0	4.0	4.0
INTUIT				-3	-43.9	-38.3	-27.7	14.5
INTUIT				-2	-29.5	0.8	21.5	37.0
INTUIT				-23	-9.5	-9.5	17.1	17.1
INTUIT				-2	9.6	9.6	9.6	9.6
INTUIT				0	2.9	2.9	2.9	2.9
INTUIT				8	-9.3	4.2	14.9	25.1
INTUIT								

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year				
					Minimum	25th Percentile	75th Percentile	Maximum
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
			--(Count)--		-----------------(Percent)-----------------			
INTUIT			██████	-8	-3.3	0.4	7.3	40.7
INTUIT				49	-6.0	1.9	6.3	14.5
INTUIT				-9	-10.8	1.4	6.7	20.3
INTUIT				-2	-30.1	-11.3	-2.4	9.6
INTUIT				-3	-1.8	1.0	15.3	30.6
INTUIT				-17				
INTUIT				-2	-3.9	-1.5	8.0	12.4
INTUIT				15	-32.6	-21.8	-2.8	8.8
INTUIT				-4	-21.5	-2.9	17.1	65.2
INTUIT				-21	1.3	3.4	22.5	31.4
INTUIT				1	1.6	2.5	13.5	14.5
INTUIT				-6	1.8	10.7	24.1	26.6
INTUIT				19	-23.2	-23.1	-5.4	4.8
INTUIT				-2	-15.9	-0.8	16.0	33.3
INTUIT				-14	-13.8	1.9	9.8	18.0
INTUIT				-6	-1.8	3.7	14.1	23.0
INTUIT				-3	3.8	3.8	4.7	4.7

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
(a)	(b)	(c)	(d)	(e)	Minimum	25th Percentile	75th Percentile	Maximum
			(Count)	(Count)	(f)	(g)	(h)	(i)
					(Percent)			
PIXAR	2001	ANIMATOR						
PIXAR	2002	ANIMATOR						
PIXAR	2003	ANIMATOR						
PIXAR	2004	ANIMATOR						
PIXAR	2005	ANIMATOR						
PIXAR	2006	ANIMATOR						
PIXAR	2007	ANIMATOR						
PIXAR	2008	ANIMATOR						
PIXAR	2009	ANIMATOR						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Percent Change in Total Compensation from Prior Year			
					Minimum	25th Percentile	75th Percentile	Maximum
			------(Count)------	------(Count)------		-------(Percent)-------		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
PIXAR	2010	ANIMATOR						
PIXAR	2011	ANIMATOR						
PIXAR	2001	ARTIST_STORY						
PIXAR	2002	ARTIST_STORY						
PIXAR	2003	ARTIST_STORY						
PIXAR	2004	ARTIST_STORY						
PIXAR	2005	ARTIST_STORY						
PIXAR	2006	ARTIST_STORY						
PIXAR	2007	ARTIST_STORY						
PIXAR	2008	ARTIST_STORY						
PIXAR	2009	ARTIST_STORY						
PIXAR	2010	ARTIST_STORY						
PIXAR	2011	ARTIST_STORY						
PIXAR	2001	ENGINEER_SOFTWARE						
PIXAR	2002	ENGINEER_SOFTWARE						
PIXAR	2003	ENGINEER_SOFTWARE						
PIXAR	2004	ENGINEER_SOFTWARE						
PIXAR	2005	ENGINEER_SOFTWARE						
PIXAR	2006	ENGINEER_SOFTWARE						
PIXAR	2007	ENGINEER_SOFTWARE						
PIXAR	2008	ENGINEER_SOFTWARE						
PIXAR	2009	ENGINEER_SOFTWARE						
PIXAR	2010	ENGINEER_SOFTWARE						
PIXAR	2011	ENGINEER_SOFTWARE						
PIXAR	2008	RESIDENT_TECHNICAL_DIRECTOR						
PIXAR	2009	RESIDENT_TECHNICAL_DIRECTOR						
PIXAR	2010	RESIDENT_TECHNICAL_DIRECTOR						
PIXAR	2011	RESIDENT_TECHNICAL_DIRECTOR						
PIXAR	2001	TECHNICAL_DIRECTOR						
PIXAR	2002	TECHNICAL_DIRECTOR						
PIXAR	2003	TECHNICAL_DIRECTOR						
PIXAR	2004	TECHNICAL_DIRECTOR						
PIXAR	2005	TECHNICAL_DIRECTOR						
PIXAR	2006	TECHNICAL_DIRECTOR						
PIXAR	2007	TECHNICAL_DIRECTOR						
PIXAR	2008	TECHNICAL_DIRECTOR						

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Exhibit IV.15

Number of Employees and Changes in Total Compensation By Job Title Included in the Class
2001 to 2011

Employer	Year	Job Title	Number of Employees	Change from Previous Year	Minimum	25th Percentile	75th Percentile	Maximum
						Percent Change in Total Compensation from Prior Year		
			---(Count)---			---(Percent)---		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
PIXAR	2009	TECHNICAL_DIRECTOR						
PIXAR	2010	TECHNICAL_DIRECTOR						
PIXAR	2011	TECHNICAL_DIRECTOR						
PIXAR	2001	TECHNICAL_DIRECTOR_LEAD						
PIXAR	2002	TECHNICAL_DIRECTOR_LEAD						
PIXAR	2006	TECHNICAL_DIRECTOR_LEAD						
PIXAR	2007	TECHNICAL_DIRECTOR_LEAD						
PIXAR	2008	TECHNICAL_DIRECTOR_LEAD						
PIXAR	2009	TECHNICAL_DIRECTOR_LEAD						
PIXAR	2010	TECHNICAL_DIRECTOR_LEAD						
PIXAR	2007	TECH_DIRECTOR_DEPT_SUPV						
PIXAR	2008	TECH_DIRECTOR_DEPT_SUPV						
PIXAR	2009	TECH_DIRECTOR_DEPT_SUPV						
PIXAR	2010	TECH_DIRECTOR_DEPT_SUPV						
PIXAR	2011	TECH_DIRECTOR_DEPT_SUPV						

Notes:

Lucasfilm job title information is unavailable prior to 2006.

Only job titles with at least 25 employees in any single year have been included, with the exception of Lucasfilm. Lucasfilm titles have been included if they had at least 15 employees in any single year.

Percent changes in compensation only take account of employees present in the data with that title for the previous year.

Source:

Dr. Leamer's regression data.

Exhibit IV.16

Percent Deviation from Mean Change in Job Average
2001 to 2011

Employer	Bottom Decile	Bottom Quartile	Top Quartile	Top Decile	Range
(a)	(b)	(c)	(d)	(e)	(f) [(e) - (b)]
			------(Percent)------		
Adobe	(15.3) %	(9.5) %	9.6 %	15.9 %	31.3 %
Apple	(19.9)	(12.1)	12.1	20.5	40.3
Google	(29.6)	(18.7)	16.4	29.4	59.0
Intel	■	■	■	■	■
Intuit	(13.9)	(8.0)	8.0	13.9	27.8
Lucasfilm	(15.2)	(9.3)	8.7	14.5	29.7
Pixar	(24.4)	(12.9)	11.3	21.3	45.8

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.17

Total Compensation Trajectories of Two Apple Class Members
Correlation = 0.65
2003 to 2011

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.18

Total Compensation Trajectories of Two Adobe Class Members
Correlation = 0.60
2001 to 2011

Employee 1   Employee 2

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.19

Total Compensation Trajectories of Two Google Class Members
Correlation = 0.60
2001 to 2011

Total Compensation

2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011

Year

Employee 1   Employee2

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.20

Total Compensation Trajectories of Two Intel Class Members

Source: Dr. Leamer's regression data.

NERA Economic Consulting

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Exhibit IV.21

Title Changes of 16 Similarly Situated Apple Employees
2007, Apple "SW_DEVELOP_ENG_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011
(a)	(b)	(c)	(d)	(e)	(f)
Employee 1					
Employee 2					
Employee 3					
Employee 4					
Employee 5					
Employee 6					
Employee 7					
Employee 8					
Employee 9					
Employee 10					
Employee 11					
Employee 12					
Employee 13					
Employee 14					
Employee 15					
Employee 16					
Number of Unique Titles:	One	Three	Three	Five	Five

Source:
Dr. Leamer Merits Backup.

NERA Economic Consulting

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Exhibit IV.22

Title Changes of 34 Similarly Situated Google Employees
2007, Google "SOFTWARE_ENGINEER_III," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011
(a)	(b)	(c)	(d)	(e)	(f)

Employee 1
Employee 2
Employee 3
Employee 4
Employee 5
Employee 6
Employee 7
Employee 8
Employee 9
Employee 10
Employee 11
Employee 12
Employee 13
Employee 14
Employee 15
Employee 16
Employee 17
Employee 18
Employee 19
Employee 20
Employee 21
Employee 22
Employee 23
Employee 24
Employee 25
Employee 26
Employee 27
Employee 28
Employee 29
Employee 30
Employee 31
Employee 32
Employee 33
Employee 34

Number of Unique Titles: One / Two / Four / Four / Five

Source:
Dr. Leamer Merits Backup.

NERA Economic Consulting

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Exhibit IV.23

Title Changes of 21 Similarly Situated Intel Employees
2007, Intel "COMPONENT_DESIGN_ENGR_3," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

| Employee | 2007 | 2008 | 2009 | 2010 | 2011 |
(a)	(b)	(c)	(d)	(e)	(f)
Employee 1					
Employee 2					
Employee 3					
Employee 4					
Employee 5					
Employee 6					
Employee 7					
Employee 8					
Employee 9					
Employee 10					
Employee 11					
Employee 12					
Employee 13					
Employee 14					
Employee 15					
Employee 16					
Employee 17					
Employee 18					
Employee 19					
Employee 20					
Employee 21					
Number of Unique Titles:	One	Three	Two	Three	Five

Source:
Dr. Leamer Merits Backup.

NERA Economic Consulting

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Exhibit IV.24

Title Changes of 8 Similarly Situated Adobe Employees
2007, Adobe "MTS_SOFTWARE_DEV_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee (a)	2007 (b)	2008 (c)	2009 (d)	2009 (d)	2010 (e)	2011 (f)

Employee 1
Employee 2
Employee 3
Employee 4
Employee 5
Employee 6
Employee 7
Employee 8

Number of Unique Titles: One Two Three Three Five

Source:
Dr. Leamer Merits Backup.

NERA Economic Consulting

Exhibit IV.25

R-Squareds in Dr. Leamer's "Compensation Structure" Regressions
Are Predominantly Attributable to Employer and Job Indicators
Where Dependent Variable is Total Equity
2001 to 2011

Year	R-Squareds Using Dr. Leamer's Methodology in his Figure 13	Including Only Employer and Job Indicators	Excluding Employer and Job Indicators
(a)	(b)	(c)	(d)
		------(Percent)------	
2001	47 %	47 %	3 %
2002	73	69	14
2003	30	29	4
2004	44	42	7
2005	38	31	6
2006	35	33	2
2007	36	34	2
2008	29	27	3
2009	51	50	4
2010	38	36	3
2011	37	35	5

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.26

Growth of Equity Awarded to 16 Similarly Situated Apple Employees
2007, Apple "SW_DEVELOP_ENG_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Equity
	----------(Dollars)----------					----(Dollars)---	---(Percent)---	---(Dollars)---
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Employee 9								
Employee 10								
Employee 11								
Employee 12								
Employee 13								
Employee 14								
Employee 15								
Employee 16								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

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Exhibit IV.27

Growth of Equity Awarded to 34 Similarly Situated Google Employees
2007, Google "SOFTWARE_ENGINEER_III," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Equity
	---------	---------	---------(Dollars)---------	---------		---(Dollars)---	---(Percent)---	----(Dollars)----
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)

Employee 1
Employee 2
Employee 3
Employee 4
Employee 5
Employee 6
Employee 7
Employee 8
Employee 9
Employee 10
Employee 11
Employee 12
Employee 13
Employee 14
Employee 15
Employee 16
Employee 17
Employee 18
Employee 19
Employee 20
Employee 21
Employee 22
Employee 23
Employee 24
Employee 25
Employee 26
Employee 27
Employee 28
Employee 29
Employee 30
Employee 31
Employee 32
Employee 33
Employee 34

Minimum
Maximum
Dollar Range
Dollar Range Percent

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.28

Growth of Equity Awarded to 21 Similarly Situated Intel Employees
2007, Intel "COMPONENT_DESIGN_ENGR_3," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Equity
			------(Dollars)------			---(Dollars)---	--(Percent)--	----(Dollars)----
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Employee 9								
Employee 10								
Employee 11								
Employee 12								
Employee 13								
Employee 14								
Employee 15								
Employee 16								
Employee 17								
Employee 18								
Employee 19								
Employee 20								
Employee 21								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source:

Dr. Learner's regression data.

NERA Economic Consulting

Exhibit IV.29

Growth of Equity Awarded to 8 Similarly Situated Adobe Employees
2007, Adobe "MTS_SOFTWARE_DEV_2," Male, Tenure of Less Than 2 Years, Aged 23-24
2007 to 2011

Employee	2007	2008	2009	2010	2011	Dollar Growth	Percent Growth	Total Equity
			----(Dollars)----			---(Dollars)---	--(Percent)---	---(Dollars)---
(a)	(b)	(c)	(d)	(e)	(f)	(g) [(f) - (b)]	(h) [(g) / (b)]	(i) Σ(a):(f)
Employee 1								
Employee 2								
Employee 3								
Employee 4								
Employee 5								
Employee 6								
Employee 7								
Employee 8								
Minimum								
Maximum								
Dollar Range								
Dollar Range Percent								

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.30

Percentage of Employees Receiving Equity
By Employer and Year
2001 to 2011

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	All Defendants
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
				(Percent)				
2001	90.1 %				86.7 %	0.0 %		96.5 %
2002	29.6				28.0	0.0		81.1
2003	53.1				53.5	0.0		80.1
2004	48.4				57.4	0.0		78.7
2005	72.2				64.4	0.0		79.6
2006	69.7				93.5	0.0		85.3
2007	66.9				81.2	0.0		86.4
2008	69.1				93.0	0.0		86.5
2009	57.1				94.2	0.0		88.4
2010	56.6				93.3	0.0		85.3
2011	56.9	6			90.9	0.0		83.5

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.31

Dr. Leamer's Compensation Regression
With Base Salary as Dependent Variable

Variable (a)	Coefficient Estimate (b)	P-Value (c)
Conduct * (Log Age - Log(38))	0.00702	0.96789
Conduct * (Log(Age)^2 - Log(38)^2)	-0.00247	0.91273
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.04017 **	0.01237
Conduct	-0.02010	0.28797
ADOBE * Log(Total Base Salary/CPI) (-1)	1.13076 ***	0.00000
APPLE * Log(Total Base Salary/CPI) (-1)	0.98161 ***	0.00000
GOOGLE * Log(Total Base Salary/CPI) (-1)	0.94692 ***	0.00000
INTEL * Log(Total Base Salary/CPI) (-1)	0.99506 ***	0.00000
INTUIT * Log(Total Base Salary/CPI) (-1)	1.11642 ***	0.00000
LUCASFILM * Log(Total Base Salary/CPI) (-1)	1.04241 ***	0.00000
PIXAR * Log(Total Base Salary/CPI) (-1)	0.86928 ***	0.00000
ADOBE * Log(Total Base Salary/CPI) (-2)	-0.13295 ***	0.00133
APPLE * Log(Total Base Salary/CPI) (-2)	-0.00372	0.93047
GOOGLE * Log(Total Base Salary/CPI) (-2)	0.04405	0.63905
INTEL * Log(Total Base Salary/CPI) (-2)	0.00071	0.98191
INTUIT * Log(Total Base Salary/CPI) (-2)	-0.13405 **	0.01134
LUCASFILM * Log(Total Base Salary/CPI) (-2)	-0.08341	0.51579
PIXAR * Log(Total Base Salary/CPI) (-2)	0.10128 **	0.03415
Log(Age) (Years)	-0.38947 ***	0.00045
Log(Age)^2	0.04692 ***	0.00088
Log(Company Tenure) (Months)	0.04362 *	0.06363
Log(Company Tenure)^2	-0.00420 *	0.08729
Male	0.00044	0.44134
DLog(Information Sector Employment in San-Jose)	0.05823	0.71900
Log(Total Number of Transfers Among Defendants)	-0.03619	0.19464
Year (trend)	0.00617	0.17285
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.00428	0.74595
Log(Total Number of New Hires)	0.05426	0.21677
Log(Firm Revenue Per Employee/CPI) (-1)	0.03823	0.30740
DLog(Firm Revenue Per Employee/CPI) (-1)	-0.09121 *	0.06257
APPLE	0.12090 ***	0.00936
GOOGLE	0.09965	0.57935
INTEL	0.00656	0.92491
INTUIT	0.11560 ***	0.00069
LUCASFILM	0.21671 *	0.07717
PIXAR	0.20426 ***	0.00009
Constant	-12.00744	0.19614
State Fixed Effects	Yes	
R^2	0.9677	
Number of Observations	277,119	

Notes:

*** = significant at 1% level; ** = significant at 5% level; * = significant at 10% level.
Standard errors clustered by employer and year.
Regression run using base salary as the dependent variable.
Base salary includes any overtime payment received by the Class.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

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Exhibit IV.32

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Using Base Salary as Dependent Variable
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				----(Dollars)----				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ 214,478	$ 4,495,230	$ 7,805,633	$ 14,130,680	$ -	$ 521,587	$ 1,179,365	$ 28,346,973
2006	3,725,341	13,989,091	36,508,471	(58,652,804)	-	2,967,986	2,618,634	1,156,719
2007	5,062,235	27,665,082	73,463,713	(206,512,167)	2,384,361	5,013,950	1,870,605	(91,052,222)
2008	4,535,049	44,584,160	98,437,729	(279,036,629)	7,380,984	5,128,739	3,809,617	(115,160,351)
2009	1,259,354	47,885,324	94,076,511	(318,083,698)	5,401,308	4,375,030	3,527,671	(161,558,501)
Total	**$ 14,796,457**	**$ 138,618,887**	**$ 310,292,057**	**$ (848,154,618)**	**$ 15,166,652**	**$ 18,007,292**	**$ 13,005,891**	**$ (338,267,382)**

Notes:

Regression run using base salary as the dependent variable.
Figures in parentheses indicate overcompensation and therefore no damages.
Base salary includes any overtime payment received by the Class.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.33

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Comparison of Total Compensation for Employees with Job Level 3

Note: This analysis looks at all employees who had a job level of 3 in 2007.
Sources: Dr. Leamer's regression data, GOOG-HIGH TECH-00182931-Equity_grant_data-CONFIDENTIAL - ATTORNEYS EYES ONLY.csv.

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Exhibit IV.33

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Comparison of Total Compensation for Employees with Job Level 4

Note: This analysis looks at all employees who had a job level of 4 in 2007.
Source: Dr. Leamer's regression data, GOOG-HIGH TECH-00182931-Equity_grant_data-CONFIDENTIAL - ATTORNEYS EYES ONLY.csv.

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Exhibit IV.33

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Comparison of Total Compensation for Employees with Job Level 5

Note: This analysis looks at all employees who had a job level of 5 in 2007.
Source: Dr. Leamer's regression data, GOOG-HIGH TECH-00182931-Equity_grant_data-CONFIDENTIAL - ATTORNEYS EYES ONLY.csv.

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Exhibit IV.33

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Comparison of Total Compensation for Employees with Job Level 6

Note: This analysis looks at all employees who had a job level of 6 in 2007.
Source: Dr. Leamer's regression data, GOOG-HIGH TECH-00182931-Equity_grant_data-CONFIDENTIAL - ATTORNEYS EYES ONLY.csv.

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Exhibit IV.33

Comparison of Total Compensation for Employees with Job Level 7

Note: This analysis looks at all employees who had a job level of 7 in 2007.
Source: Dr. Leamer's regression data, GOOG-HIGH TECH-00182931-Equity_grant_data-CONFIDENTIAL - ATTORNEYS EYES ONLY.csv.

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Exhibit IV.33

Comparison of Total Compensation for Employees with Job Level 8

Note: This analysis looks at all employees who had a job level of 8 in 2007.
Source: Dr. Leamer's regression data, GOOG-HIGH TECH-00182931-Equity_grant_data-CONFIDENTIAL - ATTORNEYS EYES ONLY.csv.

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Exhibit IV.33

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Comparison of Total Compensation for Employees with Job Level 9

Note: This analysis looks at all employees who had a job level of 9 in 2007.
Source: Dr. Leamer's regression data, GOOG-HIGH TECH-00182931-Equity_grant_data-CONFIDENTIAL - ATTORNEYS EYES ONLY.csv.

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Exhibit IV.34

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Adobe Average Total Compensation per TCR Employee as a Percentage of Revenue per Employee 2001 to 2011

Notes: TCR employees counts are based on the number of employees identified as technical, creative and R&D employees in Dr. Leamer's regression data.
   Revenue per employee includes all revenues and employees at the firm as defined in Dr. Leamer's regression data.
   Numbers above reflect annual averages and are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.35

**Apple Average Total Compensation per TCR Employee
as a Percentage of Revenue per Employee
2001 to 2011**

Percent

Year

25%   20%   15%   10%   5%   0%

2001   2002   2003   2004   2005   2006   2007   2008   2009   2010   2011

Notes: TCR employees counts are based on the number of employees identified as technical, creative and R&D employees in Dr. Leamer's regression data.
    Revenue per employee includes all revenues and employees at the firm as defined in Dr. Leamer's regression data.
    Numbers above reflect annual averages and are not a continuous series.
Source: Dr. Leamer's regression data.

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Exhibit IV.36

Google Average Total Compensation per TCR Employee as a Percentage of Revenue per Employee 2001 to 2011

Percent

0%
5%
10%
15%
20%
25%
30%
35%

2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011

Year

Notes: TCR employees counts are based on the number of employees identified as technical, creative and R&D employees in Dr. Leamer's regression data.
    Revenue per employee includes all revenues and employees at the firm as defined in Dr. Leamer's regression data.
    Numbers above reflect annual averages and are not a continuous series.
Source: Dr. Leamer's regression data.

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Exhibit IV.37

**Intel Average Total Compensation per TCR Employee
as a Percentage of Revenue per Employee**

Notes: TCR employees counts are based on the number of employees identified as technical, creative and R&D employees in Dr. Leamer's regression data.
Revenue per employee includes all revenues and employees at the firm as defined in Dr. Leamer's regression data.
Numbers above reflect annual averages and are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.38

**Intuit Average Total Compensation per TCR Employee
as a Percentage of Revenue per Employee
2001 to 2011**

Notes: TCR employees counts are based on the number of employees identified as technical, creative and R&D employees in Dr. Leamer's regression data.
Revenue per employee includes all revenues and employees at the firm as defined in Dr. Leamer's regression data.
Numbers above reflect annual averages and are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.39

Lucasfilm Average Total Compensation per TCR Employee as a Percentage of Revenue per Employee 2001 to 2011

Notes: TCR employees counts are based on the number of employees identified as technical, creative and R&D employees in Dr. Leamer's regression data. Revenue per employee includes all revenues and employees at the firm as defined in Dr. Leamer's regression data. Numbers above reflect annual averages and are not a continuous series.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit IV.40

Pixar Average Total Compensation per TCR Employee as a Percentage of Revenue per Employee 2001 to 2011

Notes: TCR employees counts are based on the number of employees identified as technical, creative and R&D employees in Dr. Leamer's regression data.
Revenue per employee includes all revenues and employees at the firm as defined in Dr. Leamer's regression data.
Numbers above reflect annual averages and are not a continuous series.
Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit V.1

Class Members Excluded from Dr. Leamer's Compensation Regression
2001 to 2011

Percent of Class Members Excluded from Regression

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar
	(a)	(b)	(c)	--(Percent)-- (d)	(e)	(f)	(g)
2001	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
2002	100.00	100.00	100.00	100.00	100.00	100.00	100.00
2003	20.90	25.56	91.94	16.25	46.38	22.22	26.63
2004	26.54	24.17	85.58	20.68	35.54	23.75	22.53
2005	45.62	37.49	82.24	33.38	41.35	52.24	25.42
2006	46.98	40.58	76.75	30.74	47.77	73.72	30.66
2007	33.29	35.31	62.87	18.43	53.92	65.67	27.13
2008	31.29	38.26	51.20	17.32	47.30	45.94	30.26
2009	32.37	35.71	34.07	15.19	32.47	35.63	29.14
2010	34.15	35.93	37.13	13.15	31.69	32.54	21.72
2011	33.46	39.63	47.69	21.35	32.03	27.19	21.05
Total	**43.19 %**	**43.25 %**	**51.65 %**	**35.16 %**	**50.08 %**	**47.67 %**	**35.46 %**

Source:

Dr. Leamer's regression data.

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Exhibit V.2

Dr. Leamer's Compensation Regression

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.17749 ***	0.00981
Conduct * (Log(Age)^2 - Log(38)^2)	-0.15902 ***	0.00818
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.01696	0.57860
Conduct	-0.05589	0.21548
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.67658 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.72883 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.43291 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.68188 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.65243 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.93319 ***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.67406 ***	0.00002
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.30366 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.24566 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.36868 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.28409 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.30485 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	0.04277	0.60356
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.09407	0.42312
Log(Age) (Years)	-0.65617 ***	0.00153
Log(Age)^2	0.07899 ***	0.00269
Log(Company Tenure) (Months)	0.01775	0.69571
Log(Company Tenure)^2	-0.00122	0.79640
Male	0.00564 **	0.03064
DLog(Information Sector Employment in San-Jose)	1.87660 ***	0.00018
Log(Total Number of Transfers Among Defendants)	0.10316 ***	0.00868
Year (trend)	-0.00420	0.61560
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.02631	0.32807
Log(Total Number of New Hires)	-0.33496 ***	0.00001
Log(Firm Revenue Per Employee/CPI) (-1)	-0.04743	0.50891
DLog(Firm Revenue Per Employee/CPI) (-1)	0.13637 *	0.07455
APPLE	0.12526	0.63167
GOOGLE	1.35966 ***	0.00286
INTEL	0.10319	0.70576
INTUIT	0.12908	0.55977
LUCASFILM	0.05626	0.84778
PIXAR	1.37916 ***	0.00079
Constant	12.29186	0.46859
State Fixed Effects	Yes	
R^2	0.8685	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit V.3

Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				--(Dollars)--				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ 4,658,522	$ 12,389,008	31,615,950	$ 75,452,183	$ -	$ 1,869,276	$ 11,701,325	$ 137,686,264
2006	24,047,039	53,420,604	82,072,404	241,048,867	-	4,763,691	17,677,653	423,030,258
2007	41,161,752	114,643,030	208,765,406	285,260,671	7,673,154	7,625,011	17,979,618	683,108,643
2008	57,774,092	158,585,054	188,473,610	429,566,893	28,811,127	9,430,837	19,818,243	892,459,856
2009	47,717,855	169,367,963	262,586,429	403,181,294	22,550,728	8,500,132	13,611,854	927,516,254
Total	**$ 175,359,259**	**$ 508,405,659**	**$ 773,513,798**	**$ 1,434,509,909**	**$ 59,035,008**	**$ 32,188,948**	**$ 80,788,693**	**$ 3,063,801,274**

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

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Exhibit V.4

Named Plaintiff Michael Michael Devine (ID 6c67551eb49965a2e047c10bdf7137f1328955bb)
Actual and But-For Compensation and Alleged Damages

Employer	Year	Age	Actual Compensation	But-For Compensation	Alleged Damages
				----(Dollars)----	
(a)	**(b)**	**(c)**	**(d)**	**(e)**	**(f)** (e) - (d)
ADOBE	2006	38	$ 57,889	$ 60,956	$ 3,067
ADOBE	2007	39	146,018	158,302	12,285
ADOBE	2008	40	71,562	80,069	8,508
Total			**$ 275,468**	**$ 299,328**	**$ 23,860**

Notes:

"But-for" compensation, alleged damages, and alleged damages percentages are calculated as in the Leamer October 2013 Merits Report. Dr. Leamer multiplies the 4 conduct-related coefficients (variables #1-4 in Exhibit 2, Leamer October 2013 Merits Report) by the Class Member's relevant variable values (e.g. the Class Member's age and the Class Member's firm's hiring rate) and sums these quantities to calculate the percentage under compensation for that particular year. If a Class Member was also estimated to have been under compensated in the previous year or two years prior, the under compensation percentages from those previous years are multiplied by the Class Member's firm's persistence coefficients (see variables #5-18 in Exhibit 2, Leamer October 2013 Merits Report) and these quantities are added to the aforementioned value to arrive at the Class Member's total percentage under compensation for the current year. This percentage is then multiplied by the Class Member's actual compensation, and the product is the alleged damages. The but-for compensation is the sum of the actual compensation and the alleged damages.

This Exhibit shows all years in which Dr. Leamer has calculated damages for this employee.

Sources:

Dr. Leamer's regression data.
Dr. Murphy's backup files.

NERA Economic Consulting

Exhibit V.5

Named Plaintiff Mark Fichtner (ID 664892bb6bd695de437706d975927dd6e0f114e9)
Actual and But-For Compensation and Alleged Damages

Employer	Year	Age	Actual Compensation	But-For Compensation	Alleged Damages
			---------------------------------(Dollars)---------------------------------		
(a)	**(b)**	**(c)**	**(d)**	**(e)**	**(f)** **(e) - (d)**
INTEL	2005	34			
INTEL	2006	36			
INTEL	2008	38			
INTEL	2009	39			
Total					

Notes:

"But-for" compensation, alleged damages, and alleged damages percentages are calculated as in the Leamer October 2013 Merits Report. Dr. Leamer multiplies the 4 conduct-related coefficients (variables #1-4 in Exhibit 2, Leamer October 2013 Merits Report) by the Class Member's relevant variable values (e.g. the Class Member's age and the Class Member's firm's hiring rate) and sums these quantities to calculate the percentage under compensation for that particular year. If a Class Member was also estimated to have been under compensated in the previous year or two years prior, the under compensation percentages from those previous years are multiplied by the Class Member's firm's persistence coefficients (see variables #5-18 in Exhibit 2, Leamer October 2013 Merits Report) and these quantities are added to the aforementioned value to arrive at the Class Member's total percentage under compensation for the current year. This percentage is then multiplied by the Class Member's actual compensation, and the product is the alleged damages. The but-for compensation is the sum of the actual compensation and the alleged damages.

This Exhibit shows all years in which Dr. Leamer has calculated damages for this employee.

Sources:

Dr. Leamer's regression data.
Dr. Murphy's backup files.

NERA Economic Consulting

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Exhibit V.6

Named Plaintiff Siddharth Hariharan (ID 837531be477ffbf7f44787a74bfeb9eebeb99de3)
Actual and But-For Compensation and Alleged Damages

Employer	Year	Age	Actual Compensation	But-For Compensation	Alleged Damages
			------------------------(Dollars)------------------------		
(a)	**(b)**	**(c)**	**(d)**	**(e)**	**(f)** **(e) - (d)**
LUCASFILM	2007	26	$ 102,000	$ 112,066	$ 10,065
LUCASFILM	2008	27	58,334	68,316	9,982
Total			**$ 160,334**	**$ 180,382**	**$ 20,048**

Notes:

"But-for" compensation, alleged damages, and alleged damages percentages are calculated as in the Leamer October 2013 Merits Report. Dr. Leamer multiplies the 4 conduct-related coefficients (variables #1-4 in Exhibit 2, Leamer October 2013 Merits Report) by the Class Member's relevant variable values (e.g. the Class Member's age and the Class Member's firm's hiring rate) and sums these quantities to calculate the percentage under compensation for that particular year. If a Class Member was also estimated to have been under compensated in the previous year or two years prior, the under compensation percentages from those previous years are multiplied by the Class Member's firm's persistence coefficients (see variables #5-18 in Exhibit 2, Leamer October 2013 Merits Report) and these quantities are added to the aforementioned value to arrive at the Class Member's total percentage under compensation for the current year. This percentage is then multiplied by the Class Member's actual compensation, and the product is the alleged damages. The but-for compensation is the sum of the actual compensation and the alleged damages.

This Exhibit shows all years in which Dr. Leamer has calculated damages for this employee.
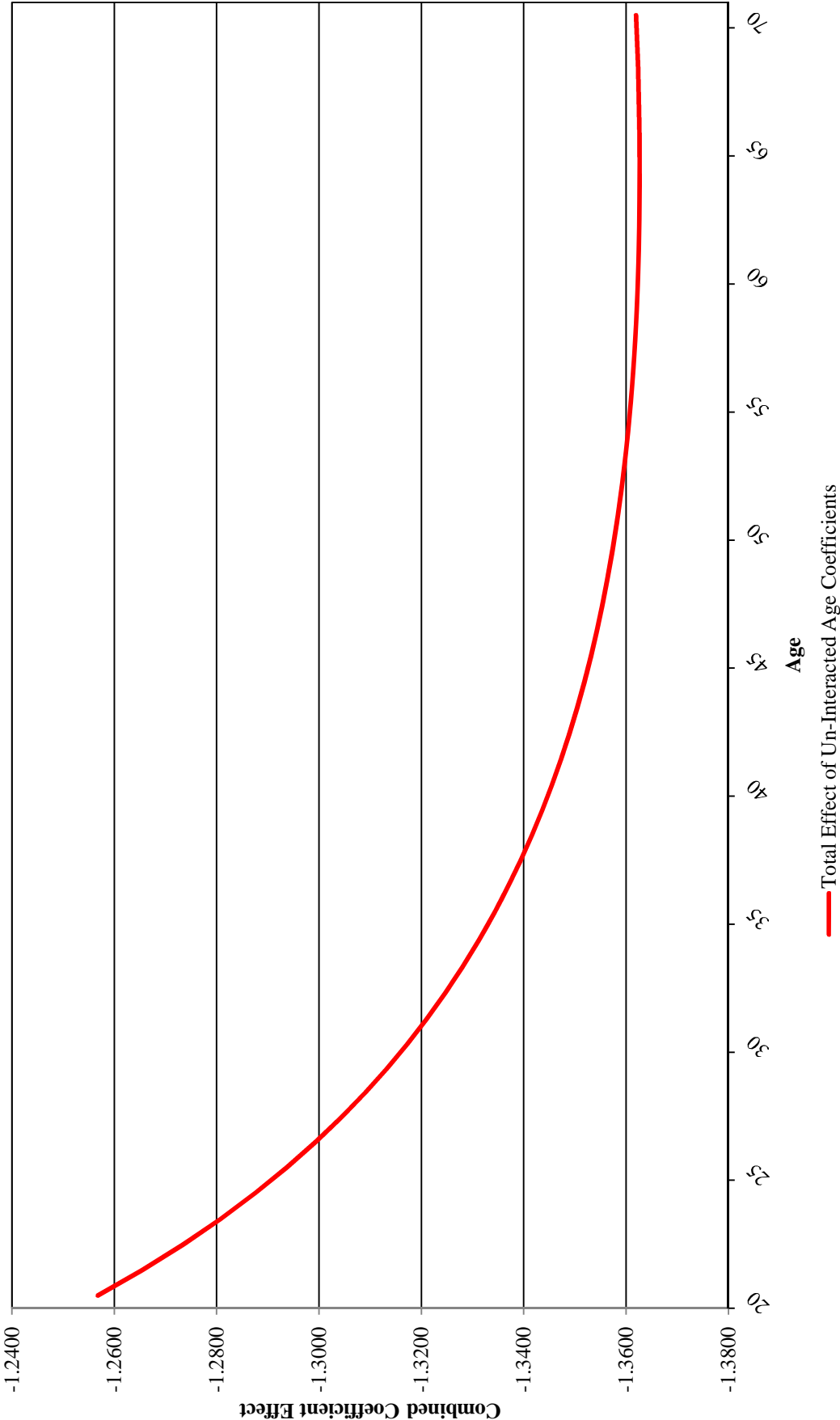
Sources:

Dr. Leamer's regression data.
Dr. Murphy's backup files.

NERA Economic Consulting

Exhibit V.7

Named Plaintiff Brandon Marshall (ID 3a40ac141778a3a2be62243a834cef0e39d8e2ff)
Actual and But-For Compensation and Alleged Damages

Employer	Year	Age	Actual Compensation	But-For Compensation	Alleged Damages
			--------------------(Dollars)--------------------		
(a)	**(b)**	**(c)**	**(d)**	**(e)**	**(f)** **(e) - (d)**
ADOBE	2006	36	$ 39,895	$ 42,072	$ 2,177

Notes:

"But-for" compensation, alleged damages, and alleged damages percentages are calculated as in the Leamer October 2013 Merits Report. Dr. Leamer multiplies the 4 conduct-related coefficients (variables #1-4 in Exhibit 2, Leamer October 2013 Merits Report) by the Class Member's relevant variable values (e.g. the Class Member's age and the Class Member's firm's hiring rate) and sums these quantities to calculate the percentage under compensation for that particular year. If a Class Member was also estimated to have been under compensated in the previous year or two years prior, the under compensation percentages from those previous years are multiplied by the Class Member's firm's persistence coefficients (see variables #5-18 in Exhibit 2, Leamer October 2013 Merits Report) and these quantities are added to the aforementioned value to arrive at the Class Member's total percentage under compensation for the current year. This percentage is then multiplied by the Class Member's actual compensation, and the product is the alleged damages. The but-for compensation is the sum of the actual compensation and the alleged damages.

This Exhibit shows all years in which Dr. Leamer has calculated damages for this employee.

Sources:

Dr. Leamer's regression data.
Dr. Murphy's backup files.

NERA Economic Consulting

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Exhibit V.8

Named Plaintiff Daniel Stover (ID 205a01d36ea877c2bf40c39d7b5d424cb872cd31)
Actual and But-For Compensation and Alleged Damages

Employer	Year	Age	Actual Compensation	But-For Compensation	Alleged Damages
			----------------------------------(Dollars)----------------------------------		
(a)	**(b)**	**(c)**	**(d)**	**(e)**	**(f)** (e) - (d)
INTUIT	2007	32	$ 49,090	$ 50,794	$ 1,705
INTUIT	2008	33	170,627	184,434	13,807
INTUIT	2009	34	130,978	140,683	9,705
Total			**$ 350,695**	**$ 375,912**	**$ 25,217**

Notes:

"But-for" compensation, alleged damages, and alleged damages percentages are calculated as in the Leamer October 2013 Merits Report. Dr. Leamer multiplies the 4 conduct-related coefficients (variables #1-4 in Exhibit 2, Leamer October 2013 Merits Report) by the Class Member's relevant variable values (e.g. the Class Member's age and the Class Member's firm's hiring rate) and sums these quantities to calculate the percentage under compensation for that particular year. If a Class Member was also estimated to have been under compensated in the previous year or two years prior, the under compensation percentages from those previous years are multiplied by the Class Member's firm's persistence coefficients (see variables #5-18 in Exhibit 2, Leamer October 2013 Merits Report) and these quantities are added to the aforementioned value to arrive at the Class Member's total percentage under compensation for the current year. This percentage is then multiplied by the Class Member's actual compensation, and the product is the alleged damages. The but-for compensation is the sum of the actual compensation and the alleged damages.

This Exhibit shows all years in which Dr. Leamer has calculated damages for this employee.

Sources:

Dr. Leamer's regression data.
Dr. Murphy's backup files.

NERA Economic Consulting

Exhibit V.9

Alleged Undercompensation Percentages by Defendant and Year Implied by Dr. Learner's Compensation Regression
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				(Dollars)				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	2.69 %	3.35 %	5.29 %	3.00 %	- %	16.08 %	13.80 %	3.67 %
2006	7.48	8.40	10.43	6.10	-	18.06	16.46	7.25
2007	10.58	12.48	12.76	7.69	3.35	20.87	16.12	9.71
2008	13.48	15.20	13.95	10.60	7.74	21.58	17.85	12.05
2009	11.17	13.71	11.10	9.43	6.29	19.23	13.63	10.53
Total	**10.08 %**	**12.10 %**	**11.48 %**	**7.75 %**	**6.15 %**	**19.82 %**	**15.70 %**	**9.33 %**

Source:

Dr. Learner's regression data.

NERA Economic Consulting

Exhibit V.10

Total Effect of Un-Interacted Age Coefficients in Dr. Leamer's Regression Model

Note: This chart shows the combined estimated effect on total compensation of the coefficients associated with the variables Log(Age) and Log(Age)^2 from Dr. Leamer's compensation regression on individuals of various ages.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit V.11

Total Effect of Conduct * Age Interaction Coefficients in Dr. Leamer's Regression Model

— Total Effect of Conduct * Age Interaction Coefficients

Note: This chart shows the combined estimated effect on total compensation of the coefficients associated with the variables Conduct * (Log(Age) - Log(38)) and Conduct * (Log(Age)^2 - Log(38)^2) from Dr. Leamer's compensation regression on individuals of various ages.

Source: Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit V.12

Alleged Damages by Conduct Variable and Year Implied by Dr. Leamer's Compensation Regression
2005 to 2009

Year	Conduct	Conduct * (Log Age - Log(38))	Conduct * (Log(Age)^2 - Log(38)^2)	Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	Total
			(Dollars)		
(a)	(b)	(c)	(d)	(e)	(f)
2005	$ 114,929,370	$ 20,805,976	$ (4,264,602)	$ 6,216,846	$ 137,687,590
2006	431,984,300	(238,753,224)	293,129,486	(63,324,889)	423,035,672
2007	716,672,455	(285,179,465)	377,055,380	(125,430,332)	683,118,038
2008	973,975,315	(649,737,498)	771,039,977	(202,805,967)	892,471,827
2009	1,014,982,985	(483,819,115)	613,492,779	(217,129,299)	927,527,351
Total	$ 3,252,544,425	$ (1,636,683,326)	$ 2,050,453,020	$ (602,473,642)	$ 3,063,840,478

Note:

Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit V.13

Effect on Alleged Damages by Conduct Variable and Year Implied by Dr. Leamer's Compensation Regression
Of Including Only Statistically Significant Conduct Variables
2005 to 2009

Year	Conduct * (Log Age - Log(38))		Conduct * (Log(Age)^2 - Log(38)^2)		Total	
(a)	(b)		(c)		(d)	
2005	$	20,805,976	$	(4,264,602)	$	16,541,373
2006		(238,753,224)		293,129,486		54,376,262
2007		(285,179,465)		377,055,380		91,875,916
2008		(649,737,498)		771,039,977		121,302,479
2009		(483,819,115)		613,492,779		129,673,665
Total	**$**	**(1,636,683,326)**	**$**	**2,050,453,020**	**$**	**413,769,694**

Note:

Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

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Exhibit V.14

Dr. Leamer's Compensation Regression
Including Only Age-Conduct Interactions

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	2.53249 **	0.03965
Conduct * (Log(Age)^2 - Log(38)^2)	-0.34362 **	0.03915
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.66413 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.72323 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.43834 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.68065 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.64836 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.91718 ***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.66892 ***	0.00002
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.31595 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.25347 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.36376 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.28531 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.30659 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	0.06029	0.44841
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.09368	0.41521
Log(Age) (Years)	-1.16121 ***	0.00463
Log(Age)^2	0.14779 ***	0.00705
Log(Company Tenure) (Months)	0.02764	0.61510
Log(Company Tenure)^2	-0.00229	0.68945
Male	0.00568 **	0.03187
DLog(Information Sector Employment in San-Jose)	1.71397 ***	0.00063
Log(Total Number of Transfers Among Defendants)	0.07420 ***	0.00774
Year (trend)	0.00340	0.49707
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01868	0.32203
Log(Total Number of New Hires)	-0.28783 ***	0.00002
Log(Firm Revenue Per Employee/CPI) (-1)	-0.06099	0.38123
DLog(Firm Revenue Per Employee/CPI) (-1)	0.12830 *	0.09165
APPLE	0.12420	0.63318
GOOGLE	1.37010 ***	0.00286
INTEL	0.10380	0.70346
INTUIT	0.15066	0.48784
LUCASFILM	0.05161	0.85682
PIXAR	1.40454 ***	0.00047
Constant	-2.36662	0.81849
State Fixed Effects	Yes	
R^2	0.8680	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

Conduct and Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92) have been dropped from this
regression; these variables were not statistically significant using clustered standard errors in Dr. Leamer's model.

Source:

Dr. Leamer's regression data.

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Exhibit V.15

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Including Only Age-Conduct Interactions
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
(a)	(b)	(c)	(d)	(e) (Dollars)	(f)	(g)	(h)	(i)
2005	$ 1,028,335	$ 2,605,450	$ 9,279,175	$ 18,683,283	$ -	$ 410,234	$ 3,494,178	$ 35,500,655
2006	5,091,836	11,146,784	22,570,057	75,274,698	-	883,846	4,852,108	119,819,329
2007	9,045,299	24,124,873	54,120,024	106,083,691	1,474,732	1,419,665	5,038,583	201,306,868
2008	13,148,508	36,147,367	55,183,569	150,562,175	6,396,538	1,812,151	5,243,897	268,494,204
2009	10,947,776	39,661,978	76,386,068	147,561,368	5,109,351	1,556,668	3,781,483	285,004,693
Total	$ 39,261,754	$ 113,686,452	$ 217,538,893	$ 498,165,215	$ 12,980,622	$ 6,082,563	$ 22,410,250	$ 910,125,749

Note:

Conduct and Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92) have been dropped from this regression; these variables were not statistically significant using clustered standard errors in Dr. Leamer's model.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

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Exhibit VI.2

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				----(Dollars)----				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ 2,728,921	$ 8,426,294	$ 25,902,617	$ 47,909,006	$ -	$ 1,179,793	$ 7,258,120	$ 93,404,752
2006	14,762,573	35,101,190	64,762,895	121,518,234	-	3,351,676	11,183,415	250,679,984
2007	24,516,836	76,464,560	161,050,319	113,375,933	5,217,466	5,295,758	10,784,746	396,705,619
2008	33,743,546	106,687,245	140,880,782	182,529,928	18,250,722	6,253,901	12,337,371	500,683,495
2009	26,861,820	113,660,775	194,744,202	157,070,084	13,644,628	5,419,124	8,279,941	519,680,575
Total	**$ 102,613,696**	**$ 340,340,064**	**$ 587,340,816**	**$ 622,403,186**	**$ 37,112,816**	**$ 21,500,253**	**$ 49,843,593**	**$ 1,761,154,425**

Note:
Regression run using nominal figures.

Source:
Dr. Leamer's regression data.

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Exhibit VI.3

Dr. Leamer's Compensation Regression
Assuming Intel's Conduct Began in 2006

Variable	Coefficient Estimate		P-Value
(a)	(b)		(c)
Conduct * (Log Age - Log(38))	1.28431	***	0.00559
Conduct * (Log(Age)^2 - Log(38)^2)	-0.17425	***	0.00453
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.00962		0.74355
Conduct	-0.03266		0.44611
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.66810	***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.72617	***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.43592	***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.67316	***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.64622	***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.92762	***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.67091	***	0.00002
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.31164	***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.24901	***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.36574	***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.29289	***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.30886	***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	0.04684		0.57935
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.09436		0.42308
Log(Age) (Years)	-0.66259	***	0.00042
Log(Age)^2	0.08010	***	0.00075
Log(Company Tenure) (Months)	0.01924		0.66581
Log(Company Tenure)^2	-0.00137		0.76649
Male	0.00553	**	0.02930
DLog(Information Sector Employment in San-Jose)	1.89412	***	0.00132
Log(Total Number of Transfers Among Defendants)	0.08596	**	0.02140
Year (trend)	0.00092		0.89724
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01816		0.46395
Log(Total Number of New Hires)	-0.31878	***	0.00029
Log(Firm Revenue Per Employee/CPI) (-1)	-0.05930		0.41583
DLog(Firm Revenue Per Employee/CPI) (-1)	0.13494	*	0.08747
APPLE	0.13180		0.61613
GOOGLE	1.37139	***	0.00257
INTEL	0.09495		0.72815
INTUIT	0.14360		0.51651
LUCASFILM	0.07172		0.80633
PIXAR	1.38869	***	0.00066
Constant	1.92871		0.89496
State Fixed Effects	Yes		
R^2	0.8681		
Number of Observations	277,119		

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

Regression run assuming Intel's conduct began in 2006.

Source:

Dr. Leamer's regression data.

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Exhibit VI.4

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Assuming Intel's Conduct Began in 2006
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				---(Dollars)---				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ 2,991,382	$ 7,859,709	$ 20,362,805	$ -	$ -	$ 1,180,665	$ 7,612,324	$ 40,006,886
2006	15,302,878	33,895,909	52,673,137	111,286,643	-	2,959,072	11,393,004	227,510,643
2007	26,256,519	72,727,650	133,404,943	147,064,867	4,833,990	4,732,842	11,628,978	400,649,788
2008	37,005,525	101,203,672	122,101,527	245,286,269	18,369,109	5,873,161	12,730,374	542,569,638
2009	30,540,282	108,226,469	170,217,189	229,465,546	14,360,237	5,273,810	8,766,728	566,850,261
Total	**$ 112,096,586**	**$ 323,913,409**	**$ 498,759,601**	**$ 733,103,325**	**$ 37,563,336**	**$ 20,019,550**	**$ 52,131,408**	**$ 1,777,587,214**

Note:

Regression run assuming Intel's conduct began in 2006.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit VI.5

Dr. Leamer's Compensation Regression
Disaggregating Conduct by Defendant

Variable	Coefficient Estimate		P-Value
(a)	(b)		(c)
ADOBE * Conduct	-0.02163		0.85097
APPLE * Conduct	-0.00858		0.85637
GOOGLE * Conduct	-0.40074	***	0.00018
INTEL * Conduct	-0.00743		0.90442
INTUIT * Conduct	-0.05941		0.24849
LUCASFILM * Conduct	0.03132		0.55750
PIXAR * Conduct	0.06136		0.81054
ADOBE * Conduct * (Log Age - Log(38))	-0.57675		0.49751
APPLE * Conduct * (Log Age - Log(38))	1.21229		0.50889
GOOGLE * Conduct * (Log Age - Log(38))	1.78010		0.37507
INTEL * Conduct * (Log Age - Log(38))	0.62625		0.12733
INTUIT * Conduct * (Log Age - Log(38))	-0.52125		0.35649
LUCASFILM * Conduct * (Log Age - Log(38))	-0.63536		0.69976
PIXAR * Conduct * (Log Age - Log(38))	1.46985		0.19789
ADOBE * Conduct * (Log(Age)^2 - Log(38)^2)	0.06902		0.54392
APPLE * Conduct * (Log(Age)^2 - Log(38)^2)	-0.16511		0.49952
GOOGLE * Conduct * (Log(Age)^2 - Log(38)^2)	-0.24494		0.36871
INTEL * Conduct * (Log(Age)^2 - Log(38)^2)	-0.08700		0.10003
INTUIT * Conduct * (Log(Age)^2 - Log(38)^2)	0.06746		0.37184
LUCASFILM * Conduct * (Log(Age)^2 - Log(38)^2)	0.05838		0.79352
PIXAR * Conduct * (Log(Age)^2 - Log(38)^2)	-0.20650		0.17006
ADOBE * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.00802		0.97043
APPLE * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.11846		0.69016
GOOGLE * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.44504	***	0.00720
INTEL * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.01186		0.80360
INTUIT * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.12605		0.60289
LUCASFILM * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.01649		0.79219
PIXAR * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.00920		0.98478
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.65066	***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.71191	***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.46823	***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.68862	***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.66548	***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.87591	***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.63319	***	0.00005
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.33737	***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.27779	***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.33768	***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.27217	***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.30312	***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	0.10655		0.13053
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.07292		0.48329
ADOBE * Log(Age) (Years)	0.32834		0.53083
APPLE * Log(Age) (Years)	-1.25061		0.11165
GOOGLE * Log(Age) (Years)	-0.05716		0.93430
INTEL * Log(Age) (Years)	-0.37724	**	0.04784
INTUIT * Log(Age) (Years)	-0.73291	***	0.00038
LUCASFILM * Log(Age) (Years)	0.73688		0.35784
PIXAR * Log(Age) (Years)	0.61096		0.24552
ADOBE * Log(Age)^2	-0.05151		0.45971

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Exhibit VI.5

Dr. Leamer's Compensation Regression
Disaggregating Conduct by Defendant

Variable	Coefficient Estimate		P-Value
(a)	(b)		(c)
APPLE * Log(Age)^2	0.14085		0.16212
GOOGLE * Log(Age)^2	-0.00557		0.95081
INTEL * Log(Age)^2	0.04579	*	0.06859
INTUIT * Log(Age)^2	0.08281	***	0.00267
LUCASFILM * Log(Age)^2	-0.09337		0.35872
PIXAR * Log(Age)^2	-0.06529		0.35406
Log(Company Tenure) (Months)	-0.00235		0.94909
Log(Company Tenure)^2	0.00088		0.81212
Male	0.00491	**	0.04402
DLog(Information Sector Employment in San-Jose)	2.01562	***	0.00010
Log(Total Number of Transfers Among Defendants)	0.07632	**	0.01462
Year (trend)	0.00121		0.88064
ADOBE * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.14925	*	0.09657
APPLE * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.06922		0.50154
GOOGLE * Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.28358	***	0.00177
INTEL * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.02251		0.45715
INTUIT * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01900		0.79202
LUCASFILM * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01505		0.75984
PIXAR * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.04930		0.89080
Log(Total Number of New Hires)	-0.31656	***	0.00000
Log(Firm Revenue Per Employee/CPI) (-1)	-0.06063		0.55343
DLog(Firm Revenue Per Employee/CPI) (-1)	0.10675		0.13305
APPLE	3.05931		0.10670
GOOGLE	1.46515		0.40981
INTEL	1.15483		0.30371
INTUIT	1.88166	*	0.09573
LUCASFILM	-1.22064		0.51855
PIXAR	0.70078		0.64508
Constant	-0.18189		0.99110
State Fixed Effects	Yes		
R^2	0.8745		
Number of Observations	277,119		

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression allows the impact of the variables Conduct, Conduct * (Log Age - Log(38)), Conduct * (Log(Age)^2 - Log(38)^2), Conduct * (Log(Number of
  Hires In the Firm/Number of Employees(-1)) + 1.92), Log(Age) (Years), Log(Age)^2, and Log(Number of New Hires In the Firm/Number of Employees(-1)) to vary
  by employer.

Source:

Dr. Leamer's regression data.

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Exhibit VI.6

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Disaggregating Conduct by Defendant
2005 to 2009

Year		Adobe		Apple		Google		Intel		Intuit		Lucasfilm		Pixar		Total
								----(Dollars)----								
(a)		(b)		(c)		(d)		(e)		(f)		(g)		(h)		(i)
2005	$	1,688,297	$	9,119,028	$	(146,893,979)	$	16,900,201	$	-	$	(1,318,904)	$	(9,490,468)	$	(129,995,826)
2006		8,367,224		21,011,168		(217,072,184)		121,655,040		-		(3,573,952)		(13,856,230)		(83,468,934)
2007		14,174,387		62,744,984		(295,246,069)		210,656,017		2,067,075		(5,675,546)		(14,220,927)		(25,500,079)
2008		20,310,642		92,921,998		161,397,708		291,073,202		33,610,252		(6,708,469)		(15,174,292)		577,431,040
2009		16,283,545		92,152,339		399,410,545		302,056,544		36,506,061		(5,616,024)		(9,826,575)		830,966,436
Total	$	60,824,094	$	277,949,517	$	(98,403,979)	$	942,341,003	$	72,183,388	$	(22,892,895)	$	(62,568,491)	$	1,169,432,637

Notes:

This regression allows the impact of the variables Conduct, Conduct * (Log Age - Log(38)), Conduct * (Log(Age)^2 - Log(38)^2), Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92), Log(Age) (Years), Log(Age)^2, and Log(Number of New Hires In the Firm/Number of Employees(-1)) to vary by employer.
Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

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Exhibit VI.7

Dr. Leamer's Compensation Regression
Splitting Total New Hire Variable

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	0.84677 **	0.03502
Conduct * (Log(Age)^2 - Log(38)^2)	-0.11620 **	0.02753
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.01284	0.71354
Conduct	0.53292 *	0.06690
Conduct * Log(Total Number of DNCC New Hires)	-0.07329 *	0.08329
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.61627 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.73074 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.43256 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.66429 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.62670 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.87777 ***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.67622 ***	0.00002
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.36380 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.24269 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.35948 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.30115 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.32185 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	0.10830	0.47356
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.08953	0.44939
Log(Age) (Years)	-0.53123 ***	0.00554
Log(Age)^2	0.06284 ***	0.00956
Log(Company Tenure) (Months)	-0.02564	0.56157
Log(Company Tenure)^2	0.00350	0.44593
Male	0.00562 **	0.03394
DLog(Information Sector Employment in San-Jose)	1.39775 **	0.02657
Log(Total Number of Transfers Among Defendants)	0.07544 *	0.06836
Year (trend)	0.00415	0.65601
Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.06738	0.14399
Log(Total Number of DNCC New Hires)	-0.05136	0.17061
Log(Total Number of non-DNCC New Hires)	-0.13253 *	0.05332
Log(Firm Revenue Per Employee/CPI) (-1)	-0.16205 *	0.06893
DLog(Firm Revenue Per Employee/CPI) (-1)	0.19195 **	0.04282
APPLE	0.25167	0.35865
GOOGLE	1.38572 **	0.01187
INTEL	-0.01282	0.96505
INTUIT	0.20418	0.35923
LUCASFILM	-0.05949	0.85206
PIXAR	1.34573 ***	0.00047
Constant	-6.05281	0.74656
State Fixed Effects	Yes	
R^2	0.8678	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires), Log(Total Number of non-DNCC New Hires), Log(Total Number of DNCC New Hires), and Conduct * Log(Total Number of DNCC New Hires).

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit VI.8

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Splitting Total New Hire Variable
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
					(Dollars)			
2005	$ (4,095,282)	$ (3,815)	$ 20,170,630	$ (7,948,364)	$ -	$ (7,143,360)	$ (15,004,968)	$ (14,025,160)
2006	(23,126,211)	12,538,021	26,054,312	66,690,173	-	(14,482,164)	(19,377,056)	48,297,076
2007	(32,681,040)	29,595,972	49,919,309	168,674,038	680,569	(24,155,612)	(16,460,556)	175,572,680
2008	(40,265,473)	29,475,155	78,634,709	165,949,262	(1,787,738)	(29,409,923)	(14,983,178)	187,612,814
2009	(33,376,351)	14,947,037	84,721,967	121,916,230	(5,652,753)	(27,390,557)	(9,924,653)	145,240,919
Total	$ (133,544,358)	$ 86,552,372	$ 259,500,926	$ 515,281,339	$ (6,759,923)	$ (102,581,616)	$ (75,750,411)	$ 542,698,330

Notes:

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires), Log(Total Number of non-DNCC New Hires), and Conduct * Log(Total Number of DNCC New Hires).

Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

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Exhibit VI.9

Dr. Leamer's Compensation Regression
Replacing Total New Hires with Median Wage

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.06235 **	0.01860
Conduct * (Log(Age)^2 - Log(38)^2)	-0.14260 **	0.01648
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.01440	0.63399
Conduct	0.04846	0.25401
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.67109 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.73868 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.43704 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.70563 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.67393 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.93034 ***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.67869 ***	0.00002
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.30931 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.24060 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.36329 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.25988 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.28370 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	0.05298	0.55540
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.09654	0.39675
Log(Age) (Years)	-0.59036 ***	0.00501
Log(Age)^2	0.06990 ***	0.00896
Log(Company Tenure) (Months)	0.00008	0.99862
Log(Company Tenure)^2	0.00058	0.90229
Male	0.00595 **	0.02229
DLog(Information Sector Employment in San-Jose)	0.32558	0.45132
Log(Total Number of Transfers Among Defendants)	-0.05655 *	0.08036
Year (trend)	-0.08906 ***	0.00218
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.02029	0.40811
Log(Median Wage)	4.31156 ***	0.00014
DLog(Median Wage)	-2.27469 ***	0.00049
Log(Firm Revenue Per Employee/CPI) (-1)	-0.10134	0.16895
DLog(Firm Revenue Per Employee/CPI) (-1)	0.16579 **	0.03028
APPLE	0.13982	0.60219
GOOGLE	1.42311 ***	0.00192
INTEL	0.10279	0.70887
INTUIT	0.13217	0.55767
LUCASFILM	0.05558	0.84426
PIXAR	1.29193 ***	0.00130
Constant	132.16954 ***	0.00421
State Fixed Effects	Yes	
R^2	0.8685	
Number of Observations	277,119	

Notes:

*** =significant at 1% level; ** =significant at 5% level; * =significant at 10% level.
Standard errors clustered by employer and year.
This regression replaces Dr. Leamer's total new hires variable with the median wage
of the combined industry comprising "Computer and Peripheral Equipment
Manufacturing" and "Computer Systems Design and Related Services" and
the difference of this value from the prior year.

Sources:

Dr. Leamer's regression data.
Current Population Survey March Supplement Data, 2001-2011.

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Exhibit VI.10

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Replacing Total New Hires with Median Wage
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
				---(Dollars)---				
2005	$ (4,368,339)	$ (7,171,979)	$ (1,349,257)	$ (56,469,094)	$ -	$ (1,285,829)	$ (8,841,620)	$ (79,486,119)
2006	(19,744,525)	(35,667,492)	(13,413,656)	(299,888,102)	-	(1,970,029)	(12,345,142)	(383,028,948)
2007	(36,168,030)	(72,271,985)	(49,664,726)	(473,133,934)	(4,460,093)	(3,148,321)	(14,532,527)	(653,379,617)
2008	(52,941,335)	(96,229,871)	(62,054,078)	(670,123,272)	(21,516,898)	(4,822,697)	(14,244,564)	(921,932,716)
2009	(46,754,131)	(103,909,833)	(95,258,507)	(685,155,324)	(18,990,963)	(4,789,804)	(10,035,516)	(964,894,077)
Total	$ (159,976,360)	$ (315,251,160)	$ (221,740,225)	$ (2,184,769,726)	$ (44,967,955)	$ (16,016,680)	$ (59,999,370)	$ (3,002,721,476)

Notes:

This regression replaces Dr. Leamer's total new hires variable with the median wage of the combined industry comprising "Computer and Peripheral Equipment Manufacturing" and "Computer Systems
Design and Related Services" and the difference of this value from the prior year.
Figures in parentheses indicate overcompensation and therefore no damages.

Sources:

Dr. Leamer's regression data.
Current Population Survey March Supplement Data, 2001-2011.

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Exhibit VI.11

Dr. Leamer's Compensation Regression
Splitting Total New Hire Variable into Shares

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	0.93803 **	0.03664
Conduct * (Log(Age)^2 - Log(38)^2)	-0.12764 **	0.02994
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.03604	0.58670
Conduct	0.04447	0.38271
Conduct * Log(Total Number of DNCC New Hires/Number of Employees)	0.02002	0.55633
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.66738 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.71960 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.41920 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.67272 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.67479 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.99354 ***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.69027 ***	0.00001
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.31230 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.24760 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.37172 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.29128 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.27586 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	-0.04245	0.68871
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.08382	0.44591
Log(Age) (Years)	-0.53231 **	0.01506
Log(Age)^2	0.06277 **	0.02421
Log(Company Tenure) (Months)	-0.00083	0.98586
Log(Company Tenure)^2	0.00091	0.85229
Male	0.00567 **	0.03444
DLog(Information Sector Employment in San-Jose)	0.31918	0.63629
Log(Total Number of Transfers Among Defendants)	0.02334	0.53577
Year (trend)	0.01084	0.19800
Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.00281	0.95753
Log(Total Number of DNCC New Hires/Number of Employees)	-0.03401	0.50338
Log(Total Number of non-DNCC New Hires/Number of Employees)	-0.01403	0.78530
Log(Firm Revenue Per Employee/CPI) (-1)	-0.06876	0.43570
DLog(Firm Revenue Per Employee/CPI) (-1)	0.10380	0.23029
APPLE	0.19025	0.48699
GOOGLE	1.43379 ***	0.00655
INTEL	-0.01742	0.95623
INTUIT	0.20088	0.36160
LUCASFILM	0.25148	0.47895
PIXAR	1.37718 ***	0.00046
Constant	-20.62578	0.21880
State Fixed Effects	Yes	
R^2	0.8645	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and Conduct * Log(Total Number of DNCC New Hires/Number of Employees).

Source:

Dr. Leamer's regression data.

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Exhibit VI.12

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Splitting Total New Hire Variable into Shares
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
				(Dollars)				
2005	$ (2,615,711)	$ (1,541,440)	$ 7,999,145	$ 26,980,657	$ -	$ (852,906)	$ (9,510,185)	$ 20,459,561
2006	(8,292,951)	(15,927,881)	22,438,729	(49,927,387)	-	366,235	(12,663,419)	(64,006,675)
2007	(19,203,395)	(26,419,534)	52,489,907	(200,883,985)	(1,975,376)	1,666,889	(16,858,224)	(211,183,717)
2008	(31,613,813)	(25,507,969)	20,368,971	(235,697,070)	(13,523,824)	720,340	(15,560,318)	(300,813,684)
2009	(30,363,876)	(23,946,936)	23,028,471	(264,847,389)	(12,480,942)	109,740	(11,204,102)	(319,705,032)
Total	**$ (92,089,745)**	**$ (93,343,759)**	**$ 126,325,222**	**$ (724,375,173)**	**$ (27,980,142)**	**$ 2,010,298**	**$ (65,796,247)**	**$ (875,249,546)**

Notes:

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and
Conduct * Log(Total Number of DNCC New Hires/Number of Employees).
Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

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Exhibit VI.13

Dr. Leamer's Compensation Regression
Splitting Total New Hire Variable into Shares
Assuming Intel's Conduct Began in 2006

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.10272 **	0.01572
Conduct * (Log(Age)^2 - Log(38)^2)	-0.15082 **	0.01202
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.02569	0.60372
Conduct	0.00370	0.93823
Conduct * Log(Total Number of DNCC New Hires/Number of Employees)	-0.02139	0.29967
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.67173 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.71872 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.42888 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.69226 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.67148 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.99746 ***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.68996 ***	0.00001
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.30671 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.25042 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.36214 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.27282 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.27914 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	-0.04869	0.68156
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.08786	0.45604
Log(Age) (Years)	-0.56555 ***	0.00317
Log(Age)^2	0.06760 ***	0.00522
Log(Company Tenure) (Months)	-0.00151	0.97465
Log(Company Tenure)^2	0.00096	0.84446
Male	0.00551 **	0.03646
DLog(Information Sector Employment in San-Jose)	0.53269	0.45192
Log(Total Number of Transfers Among Defendants)	0.01954	0.54751
Year (trend)	0.01069 *	0.08669
Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.02681	0.53464
Log(Total Number of DNCC New Hires/Number of Employees)	-0.01593	0.69325
Log(Total Number of non-DNCC New Hires/Number of Employees)	-0.03623	0.47344
Log(Firm Revenue Per Employee/CPI) (-1)	-0.10770	0.21898
DLog(Firm Revenue Per Employee/CPI) (-1)	0.12244	0.15893
APPLE	0.17533	0.52025
GOOGLE	1.39044 ***	0.00716
INTEL	-0.09202	0.77140
INTUIT	0.17485	0.42933
LUCASFILM	0.34423	0.34375
PIXAR	1.36881 ***	0.00095
Constant	-20.24301	0.10619
State Fixed Effects	Yes	
R^2	0.8648	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and Conduct * Log(Total Number of DNCC New Hires/Number of Employees).

This regression assumes Intel's Conduct Began in 2006.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Exhibit VI.14

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Splitting Total New Hire Variable into Shares
Assuming Intel's Conduct Began in 2006
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				--(Dollars)--				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ (1,211,171)	$ (4,885,194)	$ (8,757,514)	$ -	$ -	$ (350,361)	$ 1,976,208	$ (13,228,032)
2006	(9,319,819)	(15,532,494)	(34,558,794)	(132,049,386)	-	(2,352,717)	2,085,363	(191,727,846)
2007	(12,684,176)	(36,944,749)	(99,719,328)	(124,802,336)	(2,018,077)	(4,879,316)	4,565,266	(276,482,716)
2008	(14,472,281)	(58,096,704)	(75,267,196)	(259,776,436)	(5,264,152)	(5,473,313)	3,439,540	(414,910,542)
2009	(10,324,738)	(65,749,319)	(106,788,274)	(242,718,933)	(4,111,296)	(4,790,386)	2,753,087	(431,729,859)
Total	$ (48,012,185)	$ (181,208,459)	$ (325,091,105)	$ (759,347,092)	$ (11,393,525)	$ (17,846,094)	$ 14,819,465	$ (1,328,078,994)

Notes:

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and
Conduct * Log(Total Number of DNCC New Hires/Number of Employees).

This regression assumes Intel's Conduct Began in 2006.

Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

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Exhibit VII.1

Dr. Leamer's Compensation Regression
Interacting Conduct Variable with Annual Indicators

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.21463 **	0.01911
Conduct * (Log(Age)^2 - Log(38)^2)	-0.16394 **	0.01649
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.01676	0.57400
Conduct * 2005 Indicator	0.16027	0.41181
Conduct * 2006 Indicator	0.00389	0.93782
Conduct * 2007 Indicator	-0.08237	0.21390
Conduct * 2008 Indicator	-0.08651	0.11866
Conduct * 2009 Indicator	-0.40886	0.31224
ADOBE * Log(Total Annual Compensation/CPI) (-1)	0.66838 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-1)	0.73477 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-1)	0.43310 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-1)	0.69948 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-1)	0.65173 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-1)	0.98071 ***	0.00000
PIXAR * Log(Total Annual Compensation/CPI) (-1)	0.70183 ***	0.00000
ADOBE * Log(Total Annual Compensation/CPI) (-2)	0.31216 ***	0.00000
APPLE * Log(Total Annual Compensation/CPI) (-2)	0.24356 ***	0.00000
GOOGLE * Log(Total Annual Compensation/CPI) (-2)	0.36897 ***	0.00000
INTEL * Log(Total Annual Compensation/CPI) (-2)	0.26677 ***	0.00000
INTUIT * Log(Total Annual Compensation/CPI) (-2)	0.30301 ***	0.00000
LUCASFILM * Log(Total Annual Compensation/CPI) (-2)	0.00211	0.98482
PIXAR * Log(Total Annual Compensation/CPI) (-2)	0.07582	0.47690
Log(Age) (Years)	-0.66726 ***	0.00281
Log(Age)^2	0.08050 ***	0.00475
Log(Company Tenure) (Months)	0.00325	0.94093
Log(Company Tenure)^2	0.00028	0.95113
Male	0.00573 **	0.02477
DLog(Information Sector Employment in San-Jose)	3.00799 ***	0.00452
Log(Total Number of Transfers Among Defendants)	0.09868 **	0.01717
Year (trend)	0.01509	0.37117
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01965	0.44709
Log(Total Number of New Hires)	-0.54268 **	0.01084
Log(Firm Revenue Per Employee/CPI) (-1)	-0.08185	0.30190
DLog(Firm Revenue Per Employee/CPI) (-1)	0.16158 **	0.02791
APPLE	0.13261	0.62037
GOOGLE	1.39556 ***	0.00194
INTEL	0.09761	0.72125
INTUIT	0.15304	0.49825
LUCASFILM	0.04072	0.89059
PIXAR	1.28604 ***	0.00105
Constant	-24.68847	0.44888
State Fixed Effects	Yes	
R^2	0.8691	
Number of Observations	277,119	

Notes:

*** =significant at 1% level; ** =significant at 5% level; * =significant at 10% level.
Standard errors clustered by employer and year.
Regression run interacting Conduct with annual indicators.

Source:

Dr. Leamer's regression data.

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Exhibit VII.2

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
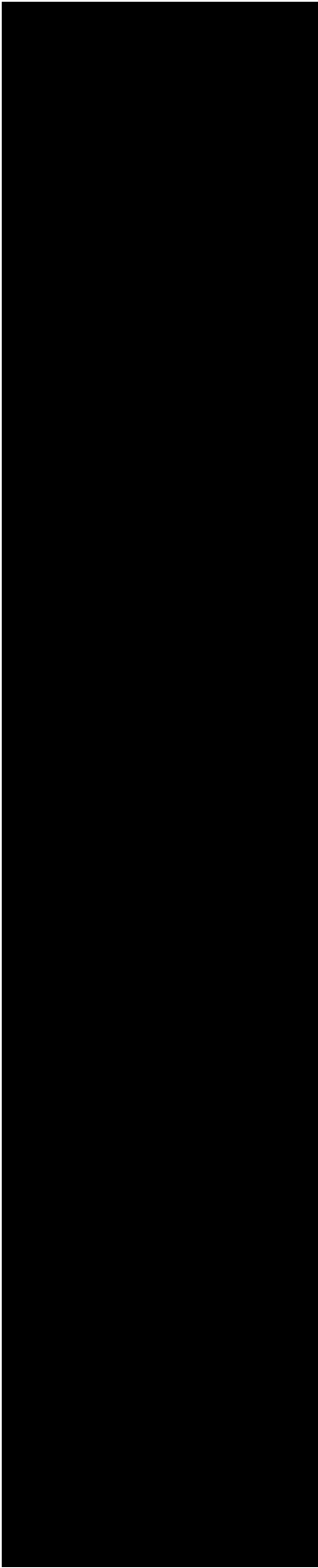**Of Interacting Conduct Variable with Annual Indicators**
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				---(Dollars)---				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ (14,063,338)	$ (27,501,525)	$ (32,970,320)	$ (196,390,699)	$ -	$ (1,671,166)	$ (12,799,596)	$ (285,396,644)
2006	(15,974,365)	(29,740,393)	15,480,331	(276,261,688)	-	(1,521,893)	(9,711,854)	(317,729,862)
2007	12,423,851	46,499,818	168,805,715	(30,426,691)	10,715,464	2,339,816	1,372,088	211,730,062
2008	39,301,729	126,988,089	195,276,966	204,455,840	43,099,804	6,282,155	11,264,192	626,668,775
2009	67,881,780	238,182,946	457,274,135	541,367,794	63,153,913	9,637,237	17,141,629	1,394,639,434
Total	**$ 89,569,657**	**$ 354,428,934**	**$ 803,866,828**	**$ 242,744,556**	**$ 116,969,182**	**$ 15,066,149**	**$ 7,266,460**	**$ 1,629,911,765**

Notes:

Regression run interacting Conduct with annual indicators.
Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

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Exhibit VII.3

Notes:

"But-for" compensation, alleged damages, and alleged damages percentages are calculated as in the Leamer October 2013 Merits Report. Dr. Leamer multiplies the 4 conduct-related coefficients (variables #1-4 in Exhibit 2, Leamer October 2013 Merits Report) by the Class Member's relevant variable values (e.g. the Class Member's age and the Class Member's firm's hiring rate) and sums these quantities to calculate the percentage under compensation for that particular year. If a Class Member was also estimated to have been under compensated in the previous year or two years prior, the under compensation percentages from those previous years are multiplied by the Class Member's firm's persistence coefficients (see variables #5-18 in Exhibit 2, Leamer October 2013 Merits Report) and these quantities are added to the aforementioned value to arrive at the Class Member's total percentage under compensation for the current year. This percentage is then multiplied by the Class Member's actual compensation, and the product is the alleged damages. The but-for compensation is the sum of the actual compensation and the alleged damages.

Sources:

Dr. Leamer's regression data.

Email Exchange, GOOG-HIGH-TECH00519070.

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Appendix Exhibit III.1

Annual Average Percent Change in Total Compensation by Defendant and Year
Using Dr. Leamer's Natural Log Methodology
Technical, Creative and R&D Employees
2002 to 2011

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar
(a)	(b)	(c)	(d)	(e) --(Percent)--	(f)	(g)	(h)
2002	(25.8) %	████	████	████	(29.6) %	10.4 %	2.7 %
2003	1.9				8.0	9.9	3.8
2004	0.5				6.2	(1.7)	(32.0)
2005	10.4				3.7	6.3	26.7
2006	6.0				13.6	10.6	15.5
2007	12.6				8.6	4.4	1.1
2008	5.7				10.5	6.8	(0.6)
2009	(8.9)				(0.3)	(0.9)	(10.6)
2010	3.6				13.2	3.6	12.4
2011	10.3				1.4	3.7	11.9

Notes: Employee counts are based on the number of employees identified as technical,
creative and R&D employees in Dr. Leamer's regression data.
Percents listed are the average change in the natural logs of total compensation
from the prior year.

Source: Dr. Leamer's regression data.

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Appendix Exhibit VI.1

Dr. Leamer's Compensation Regression
Assuming Intel's Conduct Began in 2006
Using Nominal Figures

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.29830 ***	0.00524
Conduct * (Log(Age)^2 - Log(38)^2)	-0.17578 ***	0.00429
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.01172	0.69481
Conduct	-0.01343	0.75341
ADOBE * Log(Total Annual Compensation) (-1)	0.65814 ***	0.00000
APPLE * Log(Total Annual Compensation) (-1)	0.72475 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-1)	0.44004 ***	0.00000
INTEL * Log(Total Annual Compensation) (-1)	0.67211 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-1)	0.63496 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-1)	0.87135 ***	0.00000
PIXAR * Log(Total Annual Compensation) (-1)	0.66228 ***	0.00001
ADOBE * Log(Total Annual Compensation) (-2)	0.31387 ***	0.00000
APPLE * Log(Total Annual Compensation) (-2)	0.24960 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-2)	0.36513 ***	0.00000
INTEL * Log(Total Annual Compensation) (-2)	0.29488 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-2)	0.31347 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-2)	0.08950	0.41048
PIXAR * Log(Total Annual Compensation) (-2)	0.08555	0.46643
Log(Age) (Years)	-0.66049 ***	0.00044
Log(Age)^2	0.07967 ***	0.00080
Log(Company Tenure) (Months)	0.01969	0.65202
Log(Company Tenure)^2	-0.00143	0.75151
Male	0.00563 **	0.02739
DLog(Information Sector Employment in San-Jose)	1.90081 ***	0.00085
Log(Total Number of Transfers Among Defendants)	0.06448 *	0.08762
Year (trend)	0.00454	0.54505
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01777	0.46454
Log(Total Number of New Hires)	-0.27757 ***	0.00118
Log(Firm Revenue Per Employee) (-1)	-0.05994	0.40529
DLog(Firm Revenue Per Employee (-1)	0.13454 *	0.09050
APPLE	0.07449	0.87135
GOOGLE	2.19275 ***	0.00859
INTEL	0.06472	0.89436
INTUIT	0.26564	0.53838
LUCASFILM	0.16258	0.76230
PIXAR	2.63563 ***	0.00038
Constant	-5.05201	0.73834
State Fixed Effects	Yes	
R^2	0.8787	
Number of Observations	277,119	

Notes:

*** = significant at 1% level; ** = significant at 5% level; * = significant at 10% level.

Standard errors clustered by employer and year.

Regression run assuming Intel's conduct began in 2006.

Regression run using nominal figures.

Source:

Dr. Leamer's regression data.

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Appendix Exhibit VI.2

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Assuming Intel's Conduct Began in 2006
Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
(a)	(b)	(c)	(d)	-----------(Dollars)---------- (e)	(f)	(g)	(h)	(i)
2005	$ 1,237,434	$ 4,415,215	$ 16,049,590	$ -	$ -	$ 589,426	$ 3,696,407	$ 25,988,072
2006	7,018,974	17,789,440	38,901,568	24,794,445	-	1,813,035	5,761,596	96,079,058
2007	11,377,326	39,372,985	94,485,521	7,584,477	2,703,862	2,857,113	5,335,143	163,716,427
2008	15,468,815	55,928,954	81,991,224	34,613,293	9,031,694	3,274,327	6,287,967	206,596,274
2009	11,861,904	59,620,909	112,370,498	18,535,618	6,502,907	2,777,317	4,227,102	215,896,256
Total	**$ 46,964,452**	**$ 177,127,502**	**$ 343,798,402**	**$ 85,527,834**	**$ 18,238,464**	**$ 11,311,217**	**$ 25,308,216**	**$ 708,276,087**

Notes:

Regression run assuming Intel's conduct began in 2006.
Regression run using nominal figures.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Appendix Exhibit VI.3

Dr. Leamer's Compensation Regression
Disaggregating Conduct by Defendant
Using Nominal Figures

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
ADOBE * Conduct	0.00828	0.94322
APPLE * Conduct	0.02360	0.62159
GOOGLE * Conduct	-0.38468 ***	0.00029
INTEL * Conduct	0.01459	0.81447
INTUIT * Conduct	-0.03975	0.40100
LUCASFILM * Conduct	0.04394	0.39445
PIXAR * Conduct	0.07715	0.75717
ADOBE * Conduct * (Log Age - Log(38))	-0.59443	0.48705
APPLE * Conduct * (Log Age - Log(38))	1.21859	0.50658
GOOGLE * Conduct * (Log Age - Log(38))	1.71627	0.39039
INTEL * Conduct * (Log Age - Log(38))	0.62980	0.12191
INTUIT * Conduct * (Log Age - Log(38))	-0.55362	0.32081
LUCASFILM * Conduct * (Log Age - Log(38))	-0.60897	0.71572
PIXAR * Conduct * (Log Age - Log(38))	1.52903	0.18139
ADOBE * Conduct * (Log(Age)^2 - Log(38)^2)	0.07165	0.53104
APPLE * Conduct * (Log(Age)^2 - Log(38)^2)	-0.16591	0.49735
GOOGLE * Conduct * (Log(Age)^2 - Log(38)^2)	-0.23640	0.38356
INTEL * Conduct * (Log(Age)^2 - Log(38)^2)	-0.08744 *	0.09543
INTUIT * Conduct * (Log(Age)^2 - Log(38)^2)	0.07170	0.33548
LUCASFILM * Conduct * (Log(Age)^2 - Log(38)^2)	0.05503	0.80813
PIXAR * Conduct * (Log(Age)^2 - Log(38)^2)	-0.21359	0.15610
ADOBE * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.01535	0.94396
APPLE * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.12703	0.68311
GOOGLE * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.44957 ***	0.00678
INTEL * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.00791	0.86798
INTUIT * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.10188	0.65758
LUCASFILM * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.02454	0.68216
PIXAR * Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.10248	0.83190
ADOBE * Log(Total Annual Compensation) (-1)	0.64344 ***	0.00000
APPLE * Log(Total Annual Compensation) (-1)	0.70961 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-1)	0.46846 ***	0.00000
INTEL * Log(Total Annual Compensation) (-1)	0.68661 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-1)	0.66136 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-1)	0.81906 ***	0.00000
PIXAR * Log(Total Annual Compensation) (-1)	0.62575 ***	0.00004
ADOBE * Log(Total Annual Compensation) (-2)	0.34025 ***	0.00000
APPLE * Log(Total Annual Compensation) (-2)	0.27781 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-2)	0.33433 ***	0.00000
INTEL * Log(Total Annual Compensation) (-2)	0.27654 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-2)	0.30594 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-2)	0.15767 *	0.07359
PIXAR * Log(Total Annual Compensation) (-2)	0.07004	0.50181
ADOBE * Log(Age) (Years)	0.36015	0.49062
APPLE * Log(Age) (Years)	-1.22672	0.12100
GOOGLE * Log(Age) (Years)	0.00038	0.99957
INTEL * Log(Age) (Years)	-0.40745 **	0.03401
INTUIT * Log(Age) (Years)	-0.69003 ***	0.00208
LUCASFILM * Log(Age) (Years)	0.74923	0.36670
PIXAR * Log(Age) (Years)	0.70691	0.17973
ADOBE * Log(Age)^2	-0.05565	0.42430
APPLE * Log(Age)^2	0.13777	0.17418
GOOGLE * Log(Age)^2	-0.01289	0.88674
INTEL * Log(Age)^2	0.04963 *	0.05003

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Appendix Exhibit VI.3

Dr. Leamer's Compensation Regression
Disaggregating Conduct by Defendant
Using Nominal Figures

Variable (a)	Coefficient Estimate (b)	P-Value (c)
INTUIT * Log(Age)^2	0.07712 **	0.01080
LUCASFILM * Log(Age)^2	-0.09469	0.37185
PIXAR * Log(Age)^2	-0.07701	0.27403
Log(Company Tenure) (Months)	-0.00049	0.98943
Log(Company Tenure)^2	0.00066	0.85804
Male	0.00485 **	0.04636
DLog(Information Sector Employment in San-Jose)	2.04768 ***	0.00008
Log(Total Number of Transfers Among Defendants)	0.04669	0.12614
Year (trend)	0.00798	0.41379
ADOBE * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.14727	0.10286
APPLE * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.07666	0.47044
GOOGLE * Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.28883 ***	0.00111
INTEL * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.02285	0.44819
INTUIT * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.03988	0.58205
LUCASFILM * Log(Number of New Hires In the Firm/Number of Employees(-1))	0.02148	0.64583
PIXAR * Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.00356	0.99212
Log(Total Number of New Hires)	-0.27368 ***	0.00001
Log(Firm Revenue Per Employee) (-1)	-0.07935	0.44817
DLog(Firm Revenue Per Employee) (-1)	0.10167	0.14557
APPLE	3.07551	0.11649
GOOGLE	2.39512	0.21810
INTEL	1.34809	0.28731
INTUIT	1.98305	0.11125
LUCASFILM	-1.10218	0.57320
PIXAR	2.03072	0.20949
Constant	-13.51740	0.48226
State Fixed Effects	Yes	
R^2	0.8845	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression allows the impact of the variables Conduct, Conduct * (Log Age - Log(38)), Conduct * (Log(Age)^2 - Log(38)^2), Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92), Log(Age) (Years), Log(Age)^2, and Log(Number of New Hires In the Firm/Number of Employees(-1)) to vary by employer.

This regression uses nominal figures.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Appendix Exhibit VI.4

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Disaggregating Conduct by Defendant
Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ (1,195,964)	$ 3,633,414	$ (154,733,792)	$ (11,589,643)	$ -	$ (1,625,176)	$ (6,912,118)	$ (172,423,279)
2006	(4,810,621)	(5,397,242)	(237,921,689)	(13,713,630)	-	(4,586,184)	(14,598,085)	(281,027,451)
2007	(9,712,353)	8,922,578	(348,560,109)	6,587,947	670,726	(7,181,548)	(8,731,607)	(358,004,364)
2008	(14,511,554)	19,747,131	113,981,791	1,202,251	22,949,058	(8,391,932)	(15,590,502)	119,386,243
2009	(14,133,583)	12,836,383	333,425,822	10,548,663	25,912,119	(7,017,927)	(8,864,337)	352,707,140
Total	$ (44,364,075)	$ 39,742,264	$ (293,807,976)	$ (6,964,411)	$ 49,531,903	$ (28,802,767)	$ (54,696,649)	$ (339,361,711)

--(Dollars)--

Notes:

This regression allows the impact of the variables Conduct, Conduct * (Log Age - Log(38)), Conduct * (Log(Age)^2 - Log(38)^2), Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1) + 1.92), Log(Age) (Years), Log(Age)^2, and Log(Number of New Hires In the Firm/Number of Employees(-1)) to vary by employer.
This regression uses nominal figures.
Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Appendix Exhibit VI.5

Dr. Leamer's Compensation Regression
Splitting Total New Hire Variable
Using Nominal Figures

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	0.88577 **	0.02833
Conduct * (Log(Age)^2 - Log(38)^2)	-0.12099 **	0.02252
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.01135	0.74992
Conduct	0.53934 *	0.07536
Conduct * Log(Total Number of DNCC New Hires)	-0.07190	0.10253
ADOBE * Log(Total Annual Compensation) (-1)	0.60325 ***	0.00000
APPLE * Log(Total Annual Compensation) (-1)	0.72811 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-1)	0.43591 ***	0.00000
INTEL * Log(Total Annual Compensation) (-1)	0.66430 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-1)	0.61158 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-1)	0.78563 ***	0.00003
PIXAR * Log(Total Annual Compensation) (-1)	0.67299 ***	0.00001
ADOBE * Log(Total Annual Compensation) (-2)	0.36313 ***	0.00000
APPLE * Log(Total Annual Compensation) (-2)	0.24367 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-2)	0.35470 ***	0.00000
INTEL * Log(Total Annual Compensation) (-2)	0.30462 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-2)	0.32389 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-2)	0.20755	0.32983
PIXAR * Log(Total Annual Compensation) (-2)	0.08789	0.46586
Log(Age) (Years)	-0.54254 ***	0.00427
Log(Age)^2	0.06415 ***	0.00760
Log(Company Tenure) (Months)	-0.01901	0.65614
Log(Company Tenure)^2	0.00273	0.53744
Male	0.00557 **	0.03469
DLog(Information Sector Employment in San-Jose)	1.54046 **	0.01003
Log(Total Number of Transfers Among Defendants)	0.05486	0.17554
Year (trend)	0.00967	0.33276
Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.06526	0.15531
Log(Total Number of DNCC New Hires)	-0.03810	0.30451
Log(Total Number of non-DNCC New Hires)	-0.12603 *	0.06364
Log(Firm Revenue Per Employee) (-1)	-0.15214 *	0.08756
DLog(Firm Revenue Per Employee) (-1)	0.18902 **	0.04686
APPLE	0.12862	0.78874
GOOGLE	2.23813 **	0.02116
INTEL	-0.13890	0.78677
INTUIT	0.36454	0.39884
LUCASFILM	-0.31564	0.64941
PIXAR	2.37337 ***	0.00062
Constant	-16.09450	0.41623
State Fixed Effects	Yes	
R^2	0.8785	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires), Log(Total Number of non-DNCC New Hires), and Conduct * Log(Total Number of DNCC New Hires).

This regression uses nominal figures.

Source:

Dr. Leamer's regression data.

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Appendix Exhibit VI.6

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Splitting Total New Hire Variable
Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				----------(Dollars)----------				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ (5,491,770)	$ (2,955,031)	$ 15,946,394	$ (28,564,331)	$ -	$ (7,119,825)	$ (17,799,287)	$ (45,983,851)
2006	(29,422,237)	(1,420,489)	13,495,293	(26,193,231)	-	(14,422,926)	(23,402,450)	(81,366,039)
2007	(43,673,853)	530,269	14,979,006	32,457,487	(1,161,497)	(24,001,599)	(21,010,482)	(41,880,669)
2008	(56,020,274)	(9,708,687)	42,732,045	(28,045,224)	(9,545,095)	(29,181,934)	(19,685,750)	(109,454,918)
2009	(46,304,775)	(26,655,592)	33,790,415	(70,046,335)	(11,820,098)	(26,961,613)	(13,146,251)	(161,144,249)
Total	**$ (180,912,909)**	**$ (40,209,531)**	**$ 120,943,154**	**$ (120,391,634)**	**$ (22,526,689)**	**$ (101,687,897)**	**$ (95,044,219)**	**$ (439,829,725)**

Notes:

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires), Log(Total Number of non-DNCC New Hires), and Conduct * Log(Total Number of DNCC New Hires).

This regression uses nominal figures.

Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Appendix Exhibit VI.7

Dr. Leamer's Compensation Regression
Replacing Total New Hires with Median Wage
Using Nominal Figures

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.08780 **	0.01645
Conduct * (Log(Age)^2 - Log(38)^2)	-0.14593 **	0.01450
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.01635	0.60139
Conduct	0.05542	0.21449
ADOBE * Log(Total Annual Compensation) (-1)	0.66043 ***	0.00000
APPLE * Log(Total Annual Compensation) (-1)	0.73486 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-1)	0.44035 ***	0.00000
INTEL * Log(Total Annual Compensation) (-1)	0.69881 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-1)	0.65721 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-1)	0.88246 ***	0.00000
PIXAR * Log(Total Annual Compensation) (-1)	0.67600 ***	0.00001
ADOBE * Log(Total Annual Compensation) (-2)	0.31197 ***	0.00000
APPLE * Log(Total Annual Compensation) (-2)	0.24334 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-2)	0.36277 ***	0.00000
INTEL * Log(Total Annual Compensation) (-2)	0.26807 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-2)	0.29143 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-2)	0.08967	0.48270
PIXAR * Log(Total Annual Compensation) (-2)	0.09212	0.42310
Log(Age) (Years)	-0.60147 ***	0.00412
Log(Age)^2	0.07129 ***	0.00742
Log(Company Tenure) (Months)	0.00055	0.99024
Log(Company Tenure)^2	0.00053	0.90813
Male	0.00587 **	0.02462
DLog(Information Sector Employment in San-Jose)	0.55997	0.20113
Log(Total Number of Transfers Among Defendants)	-0.06001 *	0.05902
Year (trend)	-0.07302 ***	0.00801
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01632	0.50251
Log(Median Wage)	3.75745 ***	0.00060
DLog(Median Wage)	-1.96061 ***	0.00205
Log(Firm Revenue Per Employee) (-1)	-0.08999	0.21973
DLog(Firm Revenue Per Employee) (-1)	0.15799 **	0.03958
APPLE	0.05684	0.90325
GOOGLE	2.25282 ***	0.00775
INTEL	0.06678	0.89080
INTUIT	0.27054	0.53622
LUCASFILM	0.06100	0.90295
PIXAR	2.37100 ***	0.00118
Constant	106.87942 **	0.01457
State Fixed Effects	Yes	
R^2	0.8788	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression replaces Dr. Leamer's total new hires variable with the median wage
of the combined industry comprising "Computer and Peripheral Equipment
Manufacturing" and "Computer Systems Design and Related Services" and
the difference of this value from the prior year.

This regression uses nominal figures.

Source:

Dr. Leamer's regression data.
Current Population Survey March Supplement Data, 2001-2011.

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Appendix Exhibit VI.8

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Replacing Total New Hires with Median Wage
Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
(a)	(b)	(c)	(d)	(e)----(Dollars)----	(f)	(g)	(h)	(i)
2005	$ (5,039,653)	$ (8,334,645)	(2,107,504)	$ (65,471,008)	$ -	(1,433,561)	(10,225,748)	$ (92,612,119)
2006	(22,724,535)	(41,291,377)	(16,689,777)	(345,324,579)	-	(2,200,577)	(14,236,890)	(442,467,736)
2007	(41,463,891)	(83,670,324)	(60,090,032)	(543,159,214)	(5,176,260)	(3,538,767)	(16,700,818)	(753,799,306)
2008	(60,513,028)	(111,594,176)	(74,232,329)	(769,193,795)	(24,793,602)	(5,405,746)	(16,357,167)	(1,062,089,845)
2009	(53,058,535)	(120,363,776)	(113,758,898)	(785,825,724)	(21,588,110)	(5,254,592)	(11,464,584)	(1,111,314,217)
Total	**$ (182,799,643)**	**$ (365,254,299)**	**$ (266,878,540)**	**$ (2,508,974,320)**	**$ (51,557,972)**	**$ (17,833,242)**	**$ (68,985,207)**	**$ (3,462,283,224)**

Notes:

This regression replaces Dr. Leamer's total new hires variable with the median wage of the combined industry comprising "Computer and Peripheral Equipment Manufacturing" and "Computer Systems
  Design and Related Services" and the difference of this value from the prior year.
This regression uses nominal figures.
Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.
Current Population Survey March Supplement Data, 2001-2011.

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Appendix Exhibit VI.9

Dr. Leamer's Compensation Regression
Splitting Total New Hire Variable into Shares
Using Nominal Figures

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	0.97805 **	0.02794
Conduct * (Log(Age)^2 - Log(38)^2)	-0.13277 **	0.02272
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92	-0.02925	0.66177
Conduct	0.04985	0.32360
Conduct * Log(Total Number of DNCC New Hires/Number of Employees)	0.01416	0.67325
ADOBE * Log(Total Annual Compensation) (-1)	0.65796 ***	0.00000
APPLE * Log(Total Annual Compensation) (-1)	0.71819 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-1)	0.42486 ***	0.00000
INTEL * Log(Total Annual Compensation) (-1)	0.67670 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-1)	0.65623 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-1)	0.96287 ***	0.00000
PIXAR * Log(Total Annual Compensation) (-1)	0.68537 ***	0.00000
ADOBE * Log(Total Annual Compensation) (-2)	0.31152 ***	0.00000
APPLE * Log(Total Annual Compensation) (-2)	0.24653 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-2)	0.36642 ***	0.00000
INTEL * Log(Total Annual Compensation) (-2)	0.29145 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-2)	0.28258 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-2)	-0.02937	0.81733
PIXAR * Log(Total Annual Compensation) (-2)	0.07983	0.48341
Log(Age) (Years)	-0.54943 **	0.01026
Log(Age)^2	0.06492 **	0.01696
Log(Company Tenure) (Months)	0.00213	0.96290
Log(Company Tenure)^2	0.00053	0.91131
Male	0.00552 **	0.03670
DLog(Information Sector Employment in San-Jose)	0.59564	0.35279
Log(Total Number of Transfers Among Defendants)	0.00820	0.82636
Year (trend)	0.01308	0.15740
Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.00908	0.86462
Log(Total Number of DNCC New Hires/Number of Employees)	-0.02315	0.64548
Log(Total Number of non-DNCC New Hires/Number of Employees)	-0.02048	0.69257
Log(Firm Revenue Per Employee) (-1)	-0.06151	0.47656
DLog(Firm Revenue Per Employee) (-1)	0.11335	0.19664
APPLE	0.15268	0.75298
GOOGLE	2.29618 **	0.01499
INTEL	-0.10917	0.83941
INTUIT	0.37335	0.36168
LUCASFILM	0.49292	0.40681
PIXAR	2.44612 ***	0.00024
Constant	-24.46015	0.17924
State Fixed Effects	Yes	
R^2	0.8760	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and Conduct * Log(Total Number of DNCC New Hires/Number of Employees).

This regression uses nominal figures.

Source:

Dr. Leamer's regression data.

NERA Economic Consulting

Appendix Exhibit VI.10

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Splitting Total New Hire Variable into Shares
Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				----------(Dollars)----------				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ (3,466,955)	$ (3,976,874)	$ 3,667,085	$ (2,595,177)	$ -	$ (1,071,925)	$ (10,078,997)	$ (17,522,843)
2006	(13,261,802)	(25,145,088)	7,561,705	(141,480,282)	-	(547,403)	(13,643,965)	(186,516,836)
2007	(26,893,610)	(46,890,990)	11,119,239	(304,216,551)	(3,192,441)	(148,663)	(17,272,461)	(387,495,478)
2008	(41,560,812)	(55,703,930)	(14,475,363)	(397,629,798)	(17,754,567)	(1,455,104)	(16,306,842)	(544,886,417)
2009	(37,989,422)	(57,022,576)	(26,425,348)	(421,541,291)	(15,693,599)	(1,790,759)	(11,560,332)	(572,023,327)
Total	$ **(123,172,601)**	$ **(188,739,458)**	$ **(18,552,683)**	$ **(1,267,463,099)**	$ **(36,640,606)**	$ **(5,013,855)**	$ **(68,862,597)**	$ **(1,708,444,900)**

Notes:

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and
   Conduct * Log(Total Number of DNCC New Hires/Number of Employees).
This regression uses nominal figures.
Figures in parentheses indicate overcompensation and therefore no damages.

Source:

   Dr. Leamer's regression data.

NERA Economic Consulting

Appendix Exhibit VI.11

Dr. Leamer's Compensation Regression
Splitting Total New Hire Variable into Shares
Assuming Intel's Conduct Began in 2006
Using Nominal Figures

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.13368 **	0.01353
Conduct * (Log(Age)^2 - Log(38)^2)	-0.15467 **	0.01045
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	0.03004	0.54422
Conduct	0.00928	0.84400
Conduct * Log(Total Number of DNCC New Hires/Number of Employees)	-0.02541	0.21676
ADOBE * Log(Total Annual Compensation) (-1)	0.66202 ***	0.00000
APPLE * Log(Total Annual Compensation) (-1)	0.71794 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-1)	0.43379 ***	0.00000
INTEL * Log(Total Annual Compensation) (-1)	0.69944 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-1)	0.65797 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-1)	0.94758 ***	0.00000
PIXAR * Log(Total Annual Compensation) (-1)	0.67937 ***	0.00001
ADOBE * Log(Total Annual Compensation) (-2)	0.30411 ***	0.00000
APPLE * Log(Total Annual Compensation) (-2)	0.24889 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-2)	0.35823 ***	0.00000
INTEL * Log(Total Annual Compensation) (-2)	0.26978 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-2)	0.28171 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-2)	-0.01953	0.87989
PIXAR * Log(Total Annual Compensation) (-2)	0.07798	0.51613
Log(Age) (Years)	-0.57680 ***	0.00213
Log(Age)^2	0.06897 ***	0.00359
Log(Company Tenure) (Months)	0.00184	0.96821
Log(Company Tenure)^2	0.00055	0.90866
Male	0.00544 **	0.03674
DLog(Information Sector Employment in San-Jose)	0.76714	0.23651
Log(Total Number of Transfers Among Defendants)	0.00978	0.75312
Year (trend)	0.01294 *	0.05177
Log(Number of New Hires In the Firm/Number of Employees(-1))	-0.02898	0.49554
Log(Total Number of DNCC New Hires/Number of Employees)	-0.00835	0.83417
Log(Total Number of non-DNCC New Hires/Number of Employees)	-0.04320	0.38951
Log(Firm Revenue Per Employee) (-1)	-0.10416	0.21604
DLog(Firm Revenue Per Employee) (-1)	0.13486	0.12822
APPLE	0.09377	0.84182
GOOGLE	2.21129 **	0.01530
INTEL	-0.22536	0.66982
INTUIT	0.30417	0.45898
LUCASFILM	0.60739	0.33452
PIXAR	2.52670 ***	0.00041
Constant	-23.87390 *	0.07098
State Fixed Effects	Yes	
R^2	0.8765	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and Conduct * Log(Total Number of DNCC New Hires/Number of Employees).

This regression assumes Intel's Conduct Began in 2006.

Regression run using nominal figures.

Source:

Dr. Leamer's regression data.

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Appendix Exhibit VI.12

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Splitting Total New Hire Variable into Shares
Assuming Intel's Conduct Began in 2006
Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				--(Dollars)--				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ (1,973,680)	$ (6,890,711)	$ (12,052,479)	$ -	$ -	$ (593,572)	$ 1,155,201	$ (20,355,241)
2006	(13,567,275)	(23,431,605)	(45,969,033)	(183,468,589)	-	(3,096,089)	736,673	(268,795,917)
2007	(19,416,205)	(54,226,811)	(131,891,080)	(192,426,196)	(3,060,160)	(6,154,740)	3,481,876	(403,693,317)
2008	(23,407,587)	(83,173,820)	(103,179,124)	(375,702,935)	(9,092,207)	(6,878,195)	2,051,856	(599,382,013)
2009	(17,400,887)	(93,036,023)	(146,661,668)	(357,337,657)	(7,181,015)	(5,926,633)	1,795,893	(625,747,989)
Total	**$ (75,765,634)**	**$ (260,758,972)**	**$ (439,753,384)**	**$ (1,108,935,377)**	**$ (19,333,382)**	**$ (22,649,229)**	**$ 9,221,499**	**$ (1,917,974,478)**

Notes:

This regression divides Dr. Leamer's total new hires variable into Log(Total Number of DNCC New Hires/Number of Employees), Log(Total Number of non-DNCC New Hires/Number of Employees), and
Conduct * Log(Total Number of DNCC New Hires/Number of Employees).
This regression assumes Intel's Conduct Began in 2006.
Regression run using nominal figures.
Figures in parentheses indicate overcompensation and therefore no damages.

Source:

Dr. Leamer's regression data.

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Appendix Exhibit VII.1

Dr. Leamer's Compensation Regression
Interacting Conduct Variable with Annual Indicators
Using Nominal Figures

Variable	Coefficient Estimate	P-Value
(a)	(b)	(c)
Conduct * (Log Age - Log(38))	1.27008 **	0.01603
Conduct * (Log(Age)^2 - Log(38)^2)	-0.17123 **	0.01385
Conduct * (Log(Number of New Hires In the Firm/Number of Employees(-1)) + 1.92)	-0.01714	0.57701
Conduct * 2005 Indicator	0.15127	0.40488
Conduct * 2006 Indicator	0.02148	0.66917
Conduct * 2007 Indicator	-0.05674	0.40093
Conduct * 2008 Indicator	-0.06011	0.28271
Conduct * 2009 Indicator	-0.35863	0.35390
ADOBE * Log(Total Annual Compensation) (-1)	0.65762 ***	0.00000
APPLE * Log(Total Annual Compensation) (-1)	0.73194 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-1)	0.43734 ***	0.00000
INTEL * Log(Total Annual Compensation) (-1)	0.69527 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-1)	0.63905 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-1)	0.92424 ***	0.00000
PIXAR * Log(Total Annual Compensation) (-1)	0.68997 ***	0.00000
ADOBE * Log(Total Annual Compensation) (-2)	0.31514 ***	0.00000
APPLE * Log(Total Annual Compensation) (-2)	0.24566 ***	0.00000
GOOGLE * Log(Total Annual Compensation) (-2)	0.36758 ***	0.00000
INTEL * Log(Total Annual Compensation) (-2)	0.27201 ***	0.00000
INTUIT * Log(Total Annual Compensation) (-2)	0.30661 ***	0.00000
LUCASFILM * Log(Total Annual Compensation) (-2)	0.04534	0.74248
PIXAR * Log(Total Annual Compensation) (-2)	0.07351	0.50509
Log(Age) (Years)	-0.68465 ***	0.00251
Log(Age)^2	0.08274 ***	0.00423
Log(Company Tenure) (Months)	0.00574	0.89505
Log(Company Tenure)^2	0.00001	0.99804
Male	0.00571 **	0.02513
DLog(Information Sector Employment in San-Jose)	2.89971 ***	0.00352
Log(Total Number of Transfers Among Defendants)	0.07561 *	0.07054
Year (trend)	0.01807	0.26083
Log(Number of New Hires In the Firm/Number of Employees(-1))	0.01760	0.49609
Log(Total Number of New Hires)	-0.47877 **	0.01644
Log(Firm Revenue Per Employee) (-1)	-0.07944	0.32598
DLog(Firm Revenue Per Employee) (-1)	0.16023 **	0.02973
APPLE	0.05901	0.89984
GOOGLE	2.22433 ***	0.00823
INTEL	0.06685	0.89188
INTUIT	0.30898	0.49116
LUCASFILM	0.08453	0.87546
PIXAR	2.43724 ***	0.00048
Constant	-30.44609	0.32691
State Fixed Effects	Yes	
R^2	0.8793	
Number of Observations	277,119	

Notes:

***=significant at 1% level; **=significant at 5% level; *=significant at 10% level.

Standard errors clustered by employer and year.

Regression run interacting Conduct with annual indicators.

Regression run using nominal figures.

Source:

Dr. Leamer's regression data.

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Appendix Exhibit VII.2

Effect on Alleged Damages by Defendant and Year Implied by Dr. Leamer's Compensation Regression
Of Interacting Conduct Variable with Annual Indicators
Using Nominal Figures
2005 to 2009

Year	Adobe	Apple	Google	Intel	Intuit	Lucasfilm	Pixar	Total
				----(Dollars)----				
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
2005	$ (13,282,880)	$ (25,773,609)	$ (29,779,877)	$ (184,784,039)	$ -	$ (1,554,081)	$ (11,978,586)	$ (267,153,072)
2006	(20,489,487)	(38,713,271)	3,487,813	(333,548,992)	-	(1,664,310)	(10,716,710)	(401,644,957)
2007	(258,581)	15,768,224	122,663,005	(159,959,220)	7,819,512	1,219,826	(1,964,659)	(14,711,891)
2008	17,838,143	77,200,039	143,639,912	(13,863,651)	30,504,140	3,947,372	6,182,656	265,448,611
2009	46,663,238	176,897,410	370,733,372	296,231,531	50,376,664	6,962,790	12,671,598	960,536,603
Total	$ 30,470,433	$ 205,378,793	$ 610,744,226	$ (395,924,370)	$ 88,700,317	$ 8,911,597	$ (5,805,701)	$ 542,475,294

Notes:
Regression run interacting Conduct with annual indicators.
Regression run using nominal figures.
Figures in parentheses indicate overcompensation and therefore no damages.

Source:
Dr. Leamer's regression data.

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